



Milwaukee County

Community Development Annual Action Plan

2013

Prepared by the
Housing Division of the
Department of Health and Human Services



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EXECUTIVE SUMMARY

FOURTH PROGRAM YEAR ACTION PLAN

The Fourth Annual Action Plan includes the SF 424 and Narrative Responses to Action Plan questions that CDBG, HOME, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations.

Executive Summary

- 1. The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.**

The Milwaukee County 2013 Annual Action Plan (Action Plan) is the fourth Annual Action Plan of the Milwaukee County Consolidated Plan (2010-2014). The Consolidated Plan describes strategies that address the need for affordable housing, supportive housing for special needs populations, homeless shelters and prevention, economic development, infrastructure improvements, and public services in the Milwaukee County jurisdiction. This Action Plan presents programs, activities, and resources for Program Year 2013 (January 1, 2013 to December 31, 2013) that addresses the needs and objectives identified in the five-year Consolidated Plan.

The Plan provides the basis for receiving annual funding under the U.S. Department of Housing and Urban Development (HUD) Community Planning and Development formula grant programs. Milwaukee County receives funds from two formula grant programs: Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME).

The Action Plan is an annual update to the comprehensive planning document for suburban Milwaukee County municipalities under 50,000 in population and HOME Consortium members, City of West Allis and City of Wauwatosa. The CDBG components of this plan do not include the cities of Milwaukee, West Allis and Wauwatosa.

The Milwaukee County Board of Supervisors and Milwaukee County Executive has delegated the responsibility of administering these HUD funds to the Housing Division of the Department of Health and Human Services. The Division works with municipalities, non-profit organizations, County agencies, businesses, developers, and individuals to use the community development funds to help revitalize communities and promote economic opportunity in Milwaukee County.

The activities funded through the CDBG and HOME programs address prioritized needs that are identified in the 2010 – 2014 Consolidated Plan. Program activities are designed to achieve the following national objectives:

- to ensure decent, affordable housing opportunities
- establish and maintain a suitable living environment
- expand economic opportunities, and
- end homelessness in suburban Milwaukee County

Milwaukee County will have a total estimated Action Plan budget of \$2,940,715 comprised from the following sources:

| Funding Source | 2013 Allocation |
|------------------------------------|------------------------|
| 2013 Est. CDBG Award | \$1,267,877 |
| CDBG Est. Program Income | \$89,316 |
| CDBG Reallocation (2011 PY) | \$376,225 |
| HOME Est. Grant Funds | \$907,297 |
| HOME Est. Program Income | \$300,000 |
| Total | \$2,940,715 |

With these and other funds that might become available, Milwaukee County will work to implement and follow a set of strategies designed to meet its priority needs as identified in the Consolidated Plan. A complete description of each funded project is included in the Activities section of this document. Please note that the proposed strategies identified below cover the 5-Year 2010 – 2014 Consolidated Plan time period; however, not all strategies are included in each Program Year.

Increase the supply of standard, affordable housing

| | |
|-----|--|
| 1.1 | Providing Rent Assistance |
| 1.2 | Providing New Rental Units |
| 1.3 | Rehabilitating Owner Occupied Housing |
| 1.4 | Providing Accessible Housing for the Physically Disabled |

The provision of social services to selected components of the population and assurance of access to these services.

| | |
|-----|--|
| 2.1 | Provide Health and recreational services to a growing elderly and disadvantaged population |
| 2.2 | Assure physical access to services for elderly, disabled, and other special needs populations |
| 2.3 | Provide recreational and educational opportunities for youth, in response to growing numbers of single parent households, households with two wage earners, and those responsible for foster children. |
| 2.4 | Assist crime awareness and drug abuse programs in response to burgeoning urban development in transforming communities. |
| 2.5 | Provide support services for lower income households seeking self-sufficiency. |

Improve and Develop Infrastructure

| | |
|-----|--|
| 3.1 | Replace deteriorating streets, alleys, sidewalks, bridges and sewers in lower income areas or in blighted areas. |
| 3.2 | Remove blighting influences through demolition or renovation. |
| 3.3 | Provide new infrastructure to meet demands of a growing or transforming population |
| 3.4 | Work with the private sector to meet infrastructure needs required by lower income citizens |

Economic Development and Employment

| | |
|-----|---|
| 4.1 | Provide Assistance to private businesses with the assurance that jobs will be created as a result. |
| 4.2 | Work with private, non-profit organizations to provide lower income persons with employment training. |
| 4.3 | Provide gap-filling employment services necessary for households receiving public assistance to become self-sufficient. |

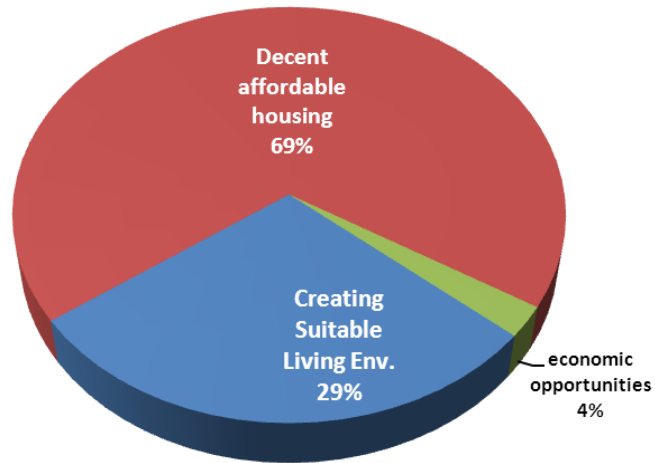
Per HUD guidance, Milwaukee County has assigned an objective that best describes the purpose for funding each project and an outcome that best reflects what Milwaukee County hopes to accomplish. The three objectives are to 1) create a suitable living environment, 2) provide decent housing, and 3) create economic opportunities. The three outcomes are to 1) increase availability and accessibility, 2) improve affordability, and 3) promote sustainability.

The table below summarizes the objectives and outcomes of Milwaukee County's 2013 CDBG and HOME activities by dollar amount.

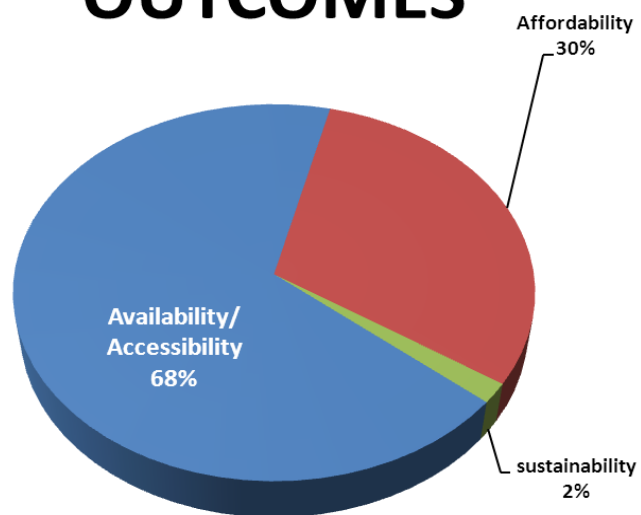
| 2013 OBJECTIVES AND OUTCOMES | | | | |
|--------------------------------------|--|----------------------|-----------------------|--------------------|
| Objectives | Outcomes | | | Total |
| | Availability/ Accessibility** | Affordability | sustainability | |
| Creating Suitable Living Env. | \$674,527 | \$0 | \$42,776 | \$717,303 |
| Decent affordable housing** | \$936,317 | \$754,473 | \$0 | \$1,690,790 |
| economic opportunities | \$60,000 | \$0 | \$0 | \$60,000 |
| Total | \$1,670,844 | \$754,473 | \$42,776 | \$2,468,093 |
| * Does not include administration | | | | |

2013 Budget by Performance Measurement Objectives and Outcomes

OBJECTIVES



OUTCOMES



Public Participation

Milwaukee County implemented its Citizen Participation Plan, which identified a process to engage residents of the jurisdiction in the following meetings:

- Public meetings with the governing bodies of the 16 municipalities to gain public input on proposed CDBG projects
- Two Public Hearings held by the Milwaukee County Board of Supervisors to hear CDBG proposals
- A public meeting with the Community and Economic Development Committee to determine 2013 CDBG & HOME allocation
- A County Board Meeting, open to the public, to finalized the 2013 CDBG activities
- Publication of draft 2013 Action Plan for public comment, for a period of at least 30 days

Past Performance

The Milwaukee County CDBG program has worked to deliver activities that provide reasonable benefits to residents of the Urban County jurisdiction that are consistent with the objectives that are identified in the 2010 – 2014 Consolidated Plan. Examples of activities that have benefited residents of the jurisdiction include the following:

- **Hunger Task Force:** Provides food to pantries throughout the Milwaukee County CDBG jurisdiction. CDBG funds used to do minor infrastructure repairs to the work farm facilities, including; the General Store, the recycling barn and the fish hatchery. Facilities used to grow fresh fruit and vegetables, which is then provided to food pantries within the jurisdiction that serve low to moderate income people.
- **Legal Aid Society:** Project provides free legal services to LMI in jurisdiction facing foreclosure. Preventing foreclosure reduces the chances of joblessness and increases economic self-sufficiency among low to moderate income residents of the Milwaukee County jurisdiction.
- **Village of West Milwaukee:** Improvements to the West Milwaukee Community Center allows Center to better serve 94 elderly LMI residents of West Milwaukee.

In a typical year, CDBG provides direct benefits (through a funded service or facility) to approximately 20,000 residents; at least 70% of whom are low and moderate income.

For a more complete analysis of Milwaukee County's accomplishments, please review the Consolidated Annual Performance and Evaluation Report ("CAPER") available at the Housing Division of the Department of Health and Social Services.

MANAGING THE PROCESS

Managing the Process

1. *Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan*

Milwaukee County is governed by the 18 member County Board of Supervisors and the Milwaukee County Executive. Both branches are elected to a four-year term. The Milwaukee County Executive and Board of Supervisors approve all activities for the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs that are included in the Consolidated and Annual Action Plans.

The Board of Supervisors and Milwaukee County Executive designated Milwaukee County's Housing Division of the Department of Health and Human Services as the lead agency to oversee the administration of the Consolidated Plan and the CDBG and HOME programs. The overall mission of the Housing Division is to work with municipalities, nonprofit organizations, businesses, developers, and others to revitalize communities and promote economic opportunity in Milwaukee County. As the lead agency for administering these programs, the Housing Division works in partnership with local municipalities, private and public agencies, non-profit and for-profit organizations to implement the grant programs.

2. *Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process*

Milwaukee County works in cooperation with local governments, Milwaukee County agencies, private and public agencies, non-profit and for-profit organizations, and the general public to develop the Annual Action Plan to address the housing, community development, and social service needs of suburban Milwaukee County.

The following table summarizes the process by which the 2013 Action Plan was developed.

2013 CDBG ALLOCATION TIMELINE

| | |
|---------------------------|---|
| June 18, 2012 | Public Hearing #1: Housing and community development general needs. (Regularly scheduled committee meeting.) |
| June 19, 2012 | 2013 Program year Applications Available |
| July 25, 2012 | Applications Due Date |
| September 17, 2012 | Public Hearing #2: presentation of CDBG projects Community and Economic Development Cmte meeting (regularly scheduled committee meeting) |
| September 24, 2012 | Community and Economic Development Cmte approval of allocation recommendations of CDBG and HOME funds for 2013 Program Year activities (special committee meeting). |
| September 27, 2012 | County Board of Supervisors approves CDBG and HOME funds for 2013 Program year Activities (regularly scheduled full board meeting) |

| | |
|--------------------------------------|---|
| October 10 – November 8, 2012 | Draft 2013 Annual Action Plan to be posted/available for the required 30-day public review and feedback period. |
| November 15, 2012 | Submit 2013 Annual Plan to HUD (Plan due Nov. 15th). |

Some of the organizations that participated in the development of the plan include the following:

| GROUP | ORGANIZATION and ROLE |
|----------------------------------|---|
| Milwaukee County Agencies | <p>Milwaukee County:</p> <ol style="list-style-type: none"> 1. Behavioral Health Division: Provide information on homelessness, mental illness and strategies to end homelessness. 2. Disabilities Services Division: Provided information on services needed to assure that people with disabilities retain independence in the community. 3. Parks: Provided information on ADA requirements and Parks. 4. Department on Aging: Information and assistance on all aging issues including long term care options, senior benefits and older adult services, elder abuse. 5. Office for Persons with Disabilities: provide information on accessibility, employment and the inclusion of People with disabilities. |
| Non-profits | <ol style="list-style-type: none"> 1. Milwaukee Continuum of Care: Provided information on the status of the 10 year Plan to End Homelessness. 2. Metropolitan Milwaukee Fair Housing Council: Provided information on Fair housing. |
| Local Municipalities | <ol style="list-style-type: none"> 1. All 16 municipalities in the Urban County: Provided needs and priorities for their municipalities. 2. City of Milwaukee: A CoC partner municipality; exchange information on various aspects of homeless strategy. 3. City of West Allis: Shared information on Section 8 and CDBG funds. 4. City of Wauwatosa: Shared CDBG information and discussed HOME priorities. |

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies

To ensure coordination with municipalities and non-profit partners, the Housing Division works closely with the Intergovernmental Cooperation Council (ICC) to coordinate the CDBG allocation process, review program allocations and monitor performance of the CDBG program. The 16-member ICC is comprised of the elected Mayors or Village Presidents of all 16 municipalities of the Milwaukee County Urban County jurisdiction. The Milwaukee County/ICC cooperative framework has been in place since 1979, and serves as the forum for addressing County-wide CDBG issues, including input on needs and priorities throughout

the jurisdiction, recommendations on CDBG allocations, feedback on CDBG project and program performance.

In an effort to enhance coordination between public and private housing agencies and among private and governmental health, mental health and service agencies, Milwaukee County will continue to seek input from the Milwaukee County Behavioral Health Division, the Mental Health Task Force (MHTF), and Milwaukee Continuum of Care (CoC) during the year on housing, health, social service and community development activities. The MHTF is a balanced partnership with public and private organizational representation, including faith-based organizations, that works to coordinate human service delivery in Milwaukee County and to minimize duplication of services.

The Continuum of Care Steering Committee is the oversight organization for Milwaukee County's Continuum of Care planning process, particularly as it applies to the homeless. Both organizations, CoC and MHTF, have memberships that include representation from the public and private sectors, community groups and non-profit organizations.

Milwaukee County will continue to work closely with non-profit housing development organizations to address the issue of affordable housing. Special outreach activities in the next year will target the business community, faith-based organizations and minority and immigrant populations. Actions that may be taken include, but are not limited to:

- Continuing to be involved in regional development issues through the Milwaukee 7 and other regional planning efforts. Regional development and planning gives Milwaukee County an opportunity to push for issues of equity, inclusion and access for low income people to opportunities throughout the region.
- Participating in the Housing Trust Fund Advisory Committee and with local housing providers to explore additional affordable housing strategies that could benefit Milwaukee County.
- Continuing to meet with public service agencies to determine how partnerships can be established to coordinate and link services.
- Meeting with private sector housing professionals to explore forming partnerships for providing additional affordable housing.
- Meeting with private and public sector economic development professionals to explore forming partnerships.
- Continuing to work with private firms and the Milwaukee County Community Business Development Partnership on increasing the number and percentage of Milwaukee County residents working on infrastructure activities.

INSTITUTIONAL STRUCTURE

Institutional Structure

Describe actions that will take place during the next year to develop institutional structure.

It is the primary objective of Milwaukee County to build its institutional capacity to consistently provide our partners and clients with high quality service and a value-added product. Milwaukee County continues to focus on delivering the promise of its mission to each client, stakeholder and partner, being highly responsive to the needs of users, and to continuously add value to the community we serve.

In FY 2013, Milwaukee County plans to continue working to improve its institutional structure to be highly effective at delivering value and highly responsive to the needs of the jurisdiction. Actions to develop institutional structure will include the following:

- **PROCESS IMPROVEMENT:** Continue to improve the funding allocation model in the jurisdiction to ensure that CDBG funds are being maximized to address the needs of low/moderate income people in the jurisdiction.
- **OUTREACH:** Continue to improve outreach and communication efforts in the jurisdiction to better identify needs in jurisdiction and work with partner communities to address identified needs.
- **PLANNING:** Continue working towards addressing the need to amend the Consolidated Plan to identify and address current needs in the jurisdiction.
- **ADMINISTRATION:** Continue developing an enhanced process to review and improve program processes, policies and procedures. Part of this effort will include developing and training staff, providing additional technical assistance options to partners, and establishing/modifying policies in the interest of improving program performance.

MONITORING STANDARDS AND PROCEDURES

Monitoring Standards and Procedures

Milwaukee County is committed to ensuring long term compliance with HUD regulations pertaining to the administration of CDBG and HOME funds.

All CDBG and HOME sub-recipients will be required to provide sufficient documentation proving that the activity meets the National Objectives and provides sufficient benefit the Milwaukee County jurisdiction before any CDBG funds are expended.

All Community Development Block Grant (CDBG) and HOME sub-recipients will sign binding contracts that enumerate program requirements. The Housing Division will monitor its grant recipients for compliance with specific program requirements, including applicable federal requirements, such as handicapped accessibility, fair housing, lead-based paint, and Davis-Bacon. In addition, the Housing Division will monitor in the areas of general management, performance goals, financial management, data collection and reporting, eligibility determinations, nondiscrimination, program outreach, timely reporting, coordination with other programs, and inspection of completed units.

Monitoring will consist of both desk and on-site reviews. On-site reviews will consist of periodic site visits which will include an in-depth review of agency, project and client files. Desk monitoring of voucher submittals

includes a review of contractual commitments, financial documentation, determination of cost eligibility, drawdown rates, and outcome/performance measurement review.

Primary Goals:

The Housing Division has four primary goals associated with its approach to monitoring programs and activities:

- Ensure accomplishment of service or production
- Ensure accountability of public funds
- Ensure compliance with federal requirements
- Evaluate project performance during a specific time period

These goals apply to all programs and services, including HOME and CDBG Programs.

HOME Monitoring Plan

Technical assistance on all aspects of HOME performance and compliance issues is available upon request. HOME developers, sub-recipients and/or owners are responsible for completing HOME-funded activities and maintaining compliance throughout the period of affordability in accordance with the terms of their HOME Project Agreement. HOME staff is available to provide one-on-one technical assistance to HOME sub-recipients on an as-needed basis. This is done during on-site monitoring visits, upon request or as a result of recurring findings from ongoing monitoring visits. The HOME staff objectives for monitoring are to determine if grantees are:

- Ensuring compliance of their rental housing and homebuyer activities as specified in their HOME Project.
- Agreements (as modified or amended) throughout the period of affordability.
- Maintaining rental housing properties to their applicable housing quality standards.
- Ensuring income verification is performed on an annual basis for all tenants of HOME-funded rental housing.
- Complying with other applicable laws, cross-cutting regulations and terms of the HOME Project Agreement.
- Properly complying with HOME regulations for homebuyer activities, including income verification and principal residence requirements.

Additionally, the HOME staff is working with a national Technical Assistance provider to develop a written monitoring plan and risk analysis process to be adopted for 2013.

The Project Agreement between Milwaukee County and the sponsor/developer/owner will establish specific policies for monitoring. The following timetable will be used to determine the schedule for on-site inspections for rental activities:

- Every three years for activities of one to four units,
- Every two years for activities with five to 25 units, and
- Annually for activities with 26 or more units.

Community Development Block Grant (CDBG) Monitoring Plan

Sponsor training and development opportunities are offered throughout the year for all new and current CDBG grant recipients. Milwaukee County plans on offering Training Workshops in 2013. Technical assistance on all aspects of CDBG performance and compliance issues is available upon request.

Sub-recipients are responsible for carrying out programs and activities in accordance with state and federal regulations and their CDBG contract. The role of CDBG staff is to ensure that sub-recipients carry out their CDBG funded programs in accordance with the applicable laws and regulations and to provide technical assistance. This is accomplished through desk or on-site monitoring. As part of this process, CDBG staff help sub-recipients identify and correct problems or potential problems in program implementation. The CDBG staff objectives for monitoring are to determine if grantees are:

- Carrying out their CDBG-funded activities as described in their contracts (as modified or amended)
- Carrying out the program or project in a timely manner in accordance with the schedule included in the CDBG contract
- Charging costs to the program or project which are eligible under applicable regulations
- Complying with other applicable laws, regulations and terms of the CDBG contract
- Conducting the program in a manner which minimizes the opportunity for fraud, waste and mismanagement

CDBG monitoring may consist of an on-site monitoring visit or a desk monitoring. All CDBG sub-recipients will be monitored at least once prior to a contract being administratively closed. The areas monitored may include (but are not limited to):

- Overall management system, record keeping and progress in activities
- National Objectives
- Client file review
- Financial management
- Procurement
- Efforts to use small, minority- and women-owned businesses
- Labor Standards
- Section 3
- Non-construction contracts between sub-recipients and consultants

When a sub-recipient is found to be out of compliance, CDBG staff will identify a specific period of time in which compliance should be achieved. Usually the grantee will have 30 days to correct deficiencies. Copies of supporting documentation demonstrating that corrective action has been taken will be required. Additional time for corrective action may be allowed on a case-by-case basis.

Currently, the Housing Division monitors each project that has expended funds since the previous monitoring visit. Over the next five-year cycle, the Housing Division will be evaluating the feasibility of changing to a risk analysis approach to identify the activities that will be monitored for a given year instead of monitoring every project every year. Risk analysis models from other jurisdictions will be evaluated for their applicability to Milwaukee County. For both the programs addressed in the Consolidated Plan, HUD representatives may also conduct monitoring visits to assure that grantees are carrying out their programs in accordance with applicable laws and regulations.

Monitoring Progress on Consolidated Plan

Milwaukee County will take the following actions to monitor performance in meeting Consolidated Plan goals:

- Review of project applications to ensure required consistency with Consolidated Plan objectives and goals.

- Review of project vouchers for reimbursement includes a review of the accomplishment data for each project. Staying in touch with the sponsor at this level ensures that activities meet their production targets which in turn ensure that the long range goals are being monitored.
- Policies and application tools are being revised to align with Consolidated Plan goals and priorities thereby providing the mechanism for measuring performance throughout the five year period.
- The Housing Division is in the process of developing a five-year “visual” plan for meeting Consolidated Plan goals which will highlight our progress and allow staff to see clearly where we are, at any given time, in terms of meeting five-year goals. This will be reviewed and monitored throughout the five-year period.
- The Housing Division staff have been appointed to monitor Consolidated Plan performance throughout the five-year period.
- The Housing Division will schedule a “check-in” opportunity with the Consolidated Plan Work Group mid way through the cycle to assess progress in meeting Consolidated Plan performance.

Citizen Participation 91.200 and 91.220(b)

Citizen Participation 91.200 and 91.220(b)

Provide a summary of the citizen participation and consultation process (including efforts to broaden public participation in the development of the plan.

A summary of the citizen participation process

Notices soliciting public input were placed on the County’s website, distributed to libraries within jurisdictions, mailed to consortium municipalities, and distributed to community-based organizations. Notices of all public hearings were published in the Milwaukee Journal.

Staff members held two public hearings to foster input on identified community needs for the 2013 FY Annual Plan.

Public Hearings

- The County held the first Public Hearing on June 18, 2012 during a regularly scheduled meeting with the Community and Economic Development Committee of the Board of Directors to provide information about and requirements for community development funds and to obtain citizens’ views on Milwaukee County’s housing and community development needs.
- The County held the second Public Hearing on September 17, 2012 during a regularly scheduled Board of County Commission meeting to present the recommended community development activities to the general public and to request approval from the Milwaukee County Community and Economic Development Committee to submit the activities to the Milwaukee County Board for approval.

Municipality Meetings

Each municipality in the consortium that receives federal funding through Milwaukee County held at least one public hearing to obtain citizens’ views, concerns and community needs.

The Housing Division of the Department of Health and Human Services has the responsibility of coordinating with community partners, residents and other stakeholders to identify and recommend activities. The staff worked closely with community partners to coordinate community needs. Funding decisions were based on targeted areas and identified needs within the areas based on studies, observations and communication with community stakeholders.

See section “Monitoring Standards and Procedures” for a detailed schedule for developing and approving the 2013 Annual Action Plan:

Efforts to Broaden Access to Information

Public Notices

Public Notices for the Public Hearings were posted on the County’s website, advertised in the Milwaukee Journal, Spanish Times, Milwaukee Courier, and distributed to libraries located within the jurisdiction. In addition, to expand outreach to African Americans, Hispanics, Caucasians, Native Americans, Asians, the elderly, People with Disabilities and low income persons and families, the following actions were implemented:

- All applicants who have been approved or non-approved from prior years received a letter with instructions on how to obtain an application via the Internet or by contacting the Housing Division.
- A public notice was placed in the Spanish Journal, Milwaukee Community Journal and the Milwaukee Journal Sentinel. (See attached the receipts for postings; **final document only**).
- Mailed information on the CDBG process and the availability of funds to the Milwaukee Indian Manpower Council, Oneida Social Services of SE Wisconsin, Milwaukee LGBT Community Center, Office of Persons with Disability, Independence First, Hmong American Friendship Center. (See attached the document that was mailed, **final document only**)
- All applicants were given 30 days to complete the application.
- Public Hearings were held in the Milwaukee County Courthouse.
- An Interpreter is available for the hearing impaired individuals. Notice of the availability on an interpreter is included in the notice.
- All CDBG and HOME Public Hearings are held in buildings which are handicap accessible to allow for access to elderly persons and persons with disabilities.

Public Hearings

The first Public Hearing was held during a regularly scheduled meeting of the Economic and Community Development Committee of the Board June 18, 2012 at the Milwaukee County Courthouse. The meeting took place at its regularly scheduled time, at 9:00 a.m. The Public Hearing was used to obtain additional comments on the 2013 Annual Action Plan from Board members and residents. The second and final Public Hearing was held on September 17, 2012 during a regularly scheduled Economic and Community Development Committee of the Board meeting at 9:00 am. Meeting notices were sent and posted at least a week prior to the meetings.

See attached minutes in Appendix of the first and second Public Hearings. (**final document only**)

Availability of the Plan

The draft of the plan was made available to the public at the Milwaukee County Housing Division, County website and County libraries on October 10th, 2012. Requests for copies of the final draft of the plan were made available for walk-ins, by mail or e-mail.

After the final Public Hearing and plan approval by Commissioners, additional comments from the hearing will be logged and a hard copy can be obtained from the Housing Division upon request. The approved plan will also be available at the County’s website at <http://county.milwaukee.gov/HealthandHumanServices/7753/HousingDivision/Programs/CDBG-Program.htm>. Ongoing citizen input concerning changes for next year’s plan are welcome and may be directed to the Housing Division.

A description of actions taken to encourage participation of all its residents, including the following:

1. Low- and moderate-income residents where housing and community development funds may be spent;
2. Minorities and non-English speaking persons, as well as persons with disabilities;
3. Local and regional institutions and other organizations (including businesses, developers, community and faith-based organizations);
4. Residents of public and assisted housing developments and recipients of tenant- based assistance;

Within the public notices for the public hearings, the ad informs the public that Milwaukee County will provide assistance to persons with disabilities needing interpreters or other auxiliary aids and services in order to participate in the hearing. In 2013, Milwaukee County will increase its outreach efforts by working with funded organizations and other community partners to distribute and collect information from low and moderate-income persons participating in existing programs. Milwaukee County will make efforts to accommodate persons with disabilities to ensure the opportunity to participate in the planning process.

The following table is a summary of actions that will encourage participation of all residents in the Urban County jurisdiction:

| Actions to encourage participation of all residents | | | | | | |
|---|---------|-------|------------|--------|----------|----------------|
| | Mailing | Email | Phone Call | Flyers | Brochure | Special Events |
| Low and moderate-income residents where funds may be spent | | | | | | |
| Minorities, non-English speaking persons, persons with disabilities; | | | | | | |
| Development organizations, businesses, developers, faith-based organizations); | | | | | | |
| Residents of public and assisted housing developments and recipients of tenant- based assistance; | | | | | | |

Consultation: Identify agencies, groups, and organizations that participated in the process, based on the following consultation requirements:

1. General §91.100 (a)(1) - Consult with public and private agencies that provide health services, social and fair housing services (including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons) during the preparation of the plan.
2. Homeless strategy §91.100 (a)(2) - Consult with public and private agencies that provide assisted housing, health services, and social services to determine what resources are available to address the needs of any persons that are chronically homeless.
3. Metropolitan planning §91.100 (a)(5) -- Consult with adjacent units of general local government, including local government agencies with metropolitan-wide planning responsibilities, particularly

for problems and solutions that go beyond a single jurisdiction, i.e. transportation, workforce development, economic development, etc.

4. HOPWA §91.100 (b)-- Largest city in EMSA consult broadly to develop metropolitan-wide strategy for addressing needs of persons with HIV/AIDS and their families.
5. Public housing §91.100 (c) -- Consult with the local public housing agency concerning public housing needs, planned programs, and activities.

The following agencies, groups, and organizations that participated in the process according to consultation process required by HUD:

| Fair Housing Services/Housing Strategy | |
|--|--|
| Metropolitan Milwaukee Fair Housing Coalition | The purpose of MMFHC is to promote fair housing throughout the State of Wisconsin by combating illegal housing discrimination and by creating and maintaining racially and economically integrated housing patterns. |
| Community Advocates | Community Advocates provides health care advocacy, housing assistance and homelessness prevention, utility services, case management, protective payee services, and disability advocacy services. The agency also provides housing and on-site case management for homeless people who have chronic mental illness as well as comprehensive domestic violence services, which includes emergency shelter, counseling, and case management. |
| Legal Aid Society | The Society provides free legal services to 8,000 of Milwaukee's most vulnerable residents: abused and neglected children, developmentally disabled adults, persons living with HIV/AIDS, battered women, immigrants, elderly, prisoners, mentally ill, physically impaired, unemployed, and homeless – all of whom are too poor to afford legal counsel. |
| Lead-Based Paint/HIV | |
| Wisconsin Department of Health Services | WDHS works to assure the health, safety, and well-being of Wisconsin citizens while emphasizing prevention; make Wisconsin a national leader in reforming health care; improve the lives of Wisconsin seniors and people with disabilities; increase opportunities for children to grow up safe, healthy, and successful in strong families; and create a high-performing organization that is customer-focused and values our partners and employees. |
| Planning Agencies | |
| SEWRPC | SEWRPC was created to provide objective information and professional planning initiatives to help solve problems and to focus regional attention on key issues of regional consequence. Regional planning provides a meaningful technical approach to the proper planning and design of public works systems, such as highways, transit, sewerage, water supply, park and open space facilities, flooding, air and water pollution, natural resource base deterioration, and changing land use |
| Social Service Organizations/Serving Seniors | |
| Milwaukee County Department of Aging | The mission of the Milwaukee County Department on Aging is to affirm the dignity and value of older adults of Milwaukee County by supporting their choices for living in, and giving to, our community. |

| | |
|---|--|
| National Association of Black Veterans | Based in Milwaukee, Wisconsin, the Center for Veterans Issues, Ltd. (CVI) is a 501 (c) (3) nonprofit veterans administration and management organization. CVI supports the concerns of all veterans by providing information, resources, identification of funding, technical assistance and organizational development to veteran service organizations. CVI also provides transitional housing to homeless veterans, while offering many services to help veterans transition back into the community. |
| Agencies Serving Persons with Disabilities | |
| Easter Seals of Southeast Wisconsin | Easter Seals Southeast Wisconsin provides exceptional services to ensure that all people with disabilities or special needs and their families have equal opportunities to live, learn, work and play in their communities. |
| Eisenhower Center | Eisenhower Center, Inc. is a non-profit, innovative work-training program that provides a comprehensive array of rehabilitation services for people with developmental disabilities. |

Provide a summary of citizen comments or views on the plan.

Comments offered on what Milwaukee County should address in its Plan were diverse. However, some common themes did emerge:

Comments to be included after 30-day comment period**Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.**

Milwaukee County strongly believes that everyone has a voice and a right to make comments. To preserve the integrity of the process and ensure a quality plan, Milwaukee accepts all comments.

Resources 91.220(c)(1)) and (c)(2)

Resources 91.220(c)(1)) and (c)(2)

Identify the federal, state, and local resources (including program income) the jurisdiction expects to receive to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Milwaukee County expects to receive a total of \$2,940,715 in new Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) entitlement grant funding to carry out its planned activities as outlined in the 2013 Action Plan.

| Funding Source | 2013 Allocation |
|------------------------------------|------------------------|
| 2013 Est. CDBG Award | \$1,267,877 |
| CDBG Est. Program Income | \$89,316 |
| CDBG Reallocation (2011 PY) | \$376,225 |
| HOME Est. Grant Funds | \$907,297 |
| HOME Est. Program Income | \$300,000 |
| Total | \$2,940,715 |

Other resources include the following:

- In the 2012 FY, the Housing Division Home Repair Program expects to receive income of \$89,316 of CDBG funds and \$300,000 of HOME funds.
- Milwaukee County expects to receive a total of \$11,940,818 in housing assistance payments and approximately \$1,050,000 in administrative fees, for a total of \$12,990,818.
- The Housing Division also administers the Shelter Plus Care program. Milwaukee County received a total of \$4.1 million for this program, including the following resources:
 - Tenant-based program: \$2.8 million
 - \$1.1 million for a five year grant for sponsor based Shelter Plus Care (Partnership with Mercy Housing)
 - \$433,000 over a five-year for a sponsor based Shelter Plus Care grant (partnership with Heartland Housing)
- Milwaukee County generates \$50,000 in program income on from a previously funded tax levy program. The revolving loan fund is for housing rehab.
- Milwaukee County also receives approximately \$80,000 annually of Homeless prevention funds through the ESG program (reimbursement comes from Community Advocates). The funds are used to provide security deposits and short-term rental assistance to individuals with a disability.

- Milwaukee County receives \$420,000 of HUD funds to administer the Safe haven Program. The program is a soft-entry housing program that provides housing to homeless individuals who are not yet connected to treatment.

In addition, Milwaukee County distributes state and local funds towards:

- Long-Term Care for supportive home care services. Services are provided to persons throughout Milwaukee County.
- The provision of residential supports for persons with a mental illness. This includes funding for adult family homes, community-based residential facilities (CBRF), transitional living environments, group homes, and other residential support to enable persons to reside in the community. Services are provided to persons throughout Milwaukee County.
- The purchase of service and self-directed (SDS) residential supports for persons with developmental disabilities. This includes funding toward supportive home care services, adult family homes, and other supports to enable persons to reside in their own homes. Services are provided to persons throughout Milwaukee County.

HOME Match

Pursuant to the Stafford Act, Milwaukee County, as the lead agency of the Milwaukee County HOME Consortium, will be required to provide 25% match from non-federal sources, or \$226,824.

| Project | Match Source | Amount |
|----------------------|-----------------------------|-----------|
| Deerwood Crossing II | Village of Brown Deer, land | \$578,000 |
| Deerwood Crossing II | Weinberg Foundation, grant | \$228,000 |
| Beaver Creek | Village of Brown Deer, land | \$238,095 |
| Bradley Crossing II | Village of Brown Deer, land | \$268,000 |

Explain how federal funds will leverage resources from private and non-federal public sources.

Historically, the CDBG and HOME entitlement programs have been utilized in tandem with a broad variety of funding sources to support community development and housing activities, often to attract other public and private investments. Many of these resources are competitive, or are available under limited circumstances; therefore, dollar amounts cannot be predicted overall. However, based on information contained in current project applications, Milwaukee County has compiled a detailed summary of resources expected to be leveraged by the activities proposed for Milwaukee County CDBG and HOME funding in PY 2013.

Altogether, \$2.4 million in CDBG and HOME dollars will leverage another \$30.3 million in public and private resources for a leveraging ratio of 1:12 resulting in a total community investment of \$32.7 million. Seventy-three CDBG activities will attract a total of \$2.6 million in additional public and private investment, while five HOME-assisted development activities (not including CHDO operating grant activities) will leverage another \$30.3 million. Over \$25 million in private, and other resources, including bank loans, investor equity, and cash and in-kind donations are expected to be leveraged by county federal funds, making up 84% percent of all resources going to assisted activities. Aside from the federal entitlement funds, 84% of the funds (including tax credit financing) are coming from other sources.

An additional resource for housing and community development activities is program income received from some entitlement-funded activities. The HOME program requires that program income be utilized only for HOME-eligible housing programs. CDBG-funded rehabilitation programs generate program income through the low-interest loans that are made available to homeowners.

Other funds not reflected in Table 5 include over \$12 million in Section 8 voucher funding providing approximately 2042 vouchers and Continuum of Care funding (Supportive Housing Program and Shelter Plus Care) which will go to various programs targeted to homeless activities.

The following table provides a summary of public and private funding sources, indicating the degree to which federal entitlement funds are being leveraged with private and non-federal sources of funds. A summary of the results shows that:

- The CDBG program leverages \$1,390,525 in activities to attract an additional \$15,082,405 of investment.
- The HOME program leverages \$2.8 million in Low Income Housing Tax Activities to attract \$30.3 million on investment; a 15 to 1 ratio.
- Total entitlement funding (CDBG and HOME) leverages \$2,117,852 to attract \$18,332,286 of private capital and other non-federal funds for activities.
- Investment in LIHTC projects generates a HOME match of \$1,312,195; which includes investment of local tax dollars by the Village of Brown Deer. The HOME match generated from the LIHTC projects is greater than the amount of HOME funds expected for 2013, which far exceeds the 25% required by HUD.

Table 5: Resources expected to be leverage by Milwaukee County CDBG and HOME activities, PY 2013

| Sponsor Name | Activity | Entitlement Source | Entitlement Funding | Other Nonfederal | Total Funding |
|-------------------------|--|-------------------------------|---------------------|------------------|---------------|
| City of Cudahy | Handicap Ramp Bus Pad | Public Facilities Improvement | \$30,000 | \$30,000 | \$30,000 |
| City of Cudahy | Program for the Elderly | Public Service | \$11,000 | \$160 | \$11,160 |
| City of Cudahy | property maintenance program | Public Service | \$4800 | \$3500 | \$8300 |
| City of Cudahy | Project Concern | Public Service | \$6200 | \$2200 | \$8400 |
| City of Franklin | Claire meadows Sidewalk | Public Facilities Improvement | \$80,000 | \$0 | \$80,000 |
| City of Franklin | Senior Travel | Public Service | \$5883 | \$0 | \$5883 |
| City of Franklin | SW interfaith | Public Service | \$3381 | \$0 | \$3381 |
| City of Glendale | ADA Sidewalk | Public Facilities Improvement | \$31,345 | \$53,555 | \$84,900 |
| City of Greendale | Adult Program Services | Public Service | \$9702 | \$0 | \$9702 |
| City of Greendale | ADA sidewalk and curb ramps | Public Facilities Improvement | \$29,383 | \$28,933 | \$58,316 |
| City of Greenfield | continuation of senior citizen program | Public Service | \$17,209 | \$71,115 | \$88,324 |
| City of Greenfield | Maple Grove Access | Public Facilities Improvement | \$62,000 | \$58,000 | \$120,000 |
| City of South Milwaukee | Human Concerns Boiler | Public Facilities Improvement | \$20,606 | \$0 | \$20,606 |
| City of South Milwaukee | Human Concerns Food Purchases | Public Service | \$3,000 | \$0 | \$3,000 |

Table 5: Resources expected to be leverage by Milwaukee County CDBG and HOME activities, PY 2013

| Sponsor Name | Activity | Entitlement Source | Entitlement Funding | Other Nonfederal | Total Funding |
|--|--|-------------------------------|---------------------|------------------|---------------|
| City of St. Francis | Trail System | Public Facilities Improvement | \$60,000 | \$0 | \$60,000 |
| City of St. Francis | Sidewalk Replacement Phase 2 | Public Facilities Improvement | \$50,000 | \$0 | \$50,000 |
| City of St. Francis | Sidewalk Replacement Pgm | Public Facilities Improvement | \$40,000 | \$0 | \$40,000 |
| City of St. Francis | Elderly - Interfaith | Public Service | \$5,000.00 | \$161 | \$5161 |
| Hunger Task Force | farm & fish hatchery infrastructure improvement | Public Facilities Improvement | \$26,280 | \$10,000 | \$37,280 |
| Hunger Task Force | farm & fish hatchery - well pump | Public Facilities Improvement | \$16,496.00 | \$34,366 | \$50,862 |
| Legal Aid Society of Milwaukee | Foreclosure Mediation Project | Public Service | \$21,000 | \$211,000 | \$232,000 |
| Metropolitan Milwaukee Fair Housing | Fair Housing education and outreach | Public Service | \$35,000 | \$870,248 | \$920,248 |
| Milwaukee County DHHS-Housing Division | Residential Architectural Barrier Removal | Housing Rehabilitation | \$120,000 | \$0 | \$120,000 |
| Milwaukee County DHHS-Housing Division | Emergency home repair | Housing Rehabilitation | \$60,000 | \$24,000 | \$84,000 |
| Milwaukee County DHHS-Housing Division | DHHS/Suburban Home Repair | Housing Rehabilitation | \$125,025 | \$20,000 | \$145,000 |
| Rebuilding Together Greater Milwaukee | Revitalization project for vulnerable homeowners | Housing Rehabilitation | \$95,197 | \$191,150 | \$286,347 |
| St. Mary's | Marian Center Housing Development | Housing Rehabilitation | \$100,000 | \$9,139,304 | \$9,239,304 |
| Village of Bayside | Public Service - Senior Services | Public Service | \$5598 | \$0 | \$5598 |
| Village of Brown Deer | senior citizens center - senior club | Public Service | \$25,017 | \$0 | \$25,017 |
| Village of Shorewood | Senior Resource Center | Public Service | \$10,000 | \$30,000 | \$40,000 |
| Village of Shorewood | Water Main Replacement | Public Facilities Improvement | \$21,614 | \$127,836 | \$149,450 |
| Village of Shorewood | Shoreline Interfaith | Public Service | \$2500 | \$0 | \$2500 |
| Village of West Milwaukee | community center improvements | Public Facilities Improvement | \$32,000 | \$0 | \$32,000 |
| Village of West Milwaukee | maintenance of community center | Public Facilities Improvement | \$9000 | \$0 | \$9000 |
| Wisconsin Community Services, Inc | Center for Driver's License Recovery | Public Service | \$25,000 | \$385,000 | \$410,000 |

Table 5: Resources expected to be leverage by Milwaukee County CDBG and HOME activities, PY 2013

| Sponsor Name | Activity | Entitlement Source | Entitlement Funding | Other Nonfederal | Total Funding |
|---|---------------------------------------|---|---------------------|---------------------|--------------------|
| | and Employability | | | | |
| Wisconsin Community Services, Inc | Job Training | Public Service | \$23,290 | \$210,000 | \$233,290 |
| Wisconsin Preservation Fund | Housing Development | Housing Rehabilitation | \$113,000 | \$3,611,877 | \$3,724,877 |
| Wisconsin Women's Business Initiative Corp. | microenterprise development continuum | Direct ED Assistance to Private for profit enterprise | \$60,000 | \$0 | \$60,000 |
| Total CDBG | | | \$1,390,526 | \$15,112,405 | \$16,502,31 |

| Affordable Housing Development | Entitlement Source | Entitlement Funding | Total Private | Total Funding |
|--------------------------------------|--------------------|---------------------|---------------------|---------------------|
| Deerwood Crossing II, WHEDA Mortgage | HOME | \$550,000 | \$5,565,287 | \$6,115,287 |
| Beaver Creek-LIHTC | HOME | \$810,000 | \$5,818,000 | \$6,628,000 |
| Bradley Crossing II-LIHTC | HOME | \$675,000 | \$6,854,500 | \$7,529,500 |
| Marian Center | HOME | \$822,953 | \$9,239,304 | \$10,062,257 |
| Total Resources | | \$2,857,953 | \$27,477,091 | \$30,335,044 |
| TOTAL CDBG & HOME | | \$4,248,479 | \$42,589,496 | \$45,447,449 |

Annual Objectives 91.220(c)(3)

Annual Objectives

***If not using the CPMP Tool:** Complete and submit Table 3A.

***If using the CPMP Tool:** Complete and submit the Summary of Specific Annual Objectives Worksheets or Summaries.xls

Goals and objectives to be carried out during the action plan period are indicated by placing a check in the following boxes.

| <input checked="" type="checkbox"/> | Objective Category: Decent Housing Which includes: | <input checked="" type="checkbox"/> | Objective Category: Suitable Living Environment Which includes: | <input checked="" type="checkbox"/> | Objective Category: Expanded Economic Opportunities Which includes: |
|-------------------------------------|--|-------------------------------------|---|-------------------------------------|--|
| <input checked="" type="checkbox"/> | assisting homeless persons obtain affordable housing | <input checked="" type="checkbox"/> | improving the safety and livability of neighborhoods | <input checked="" type="checkbox"/> | job creation and retention |
| <input checked="" type="checkbox"/> | assisting persons at risk of becoming homeless | <input type="checkbox"/> | eliminating blighting influences and the deterioration of property and facilities | <input checked="" type="checkbox"/> | establishment, stabilization and expansion of small business (including micro-businesses) |
| <input checked="" type="checkbox"/> | retaining the affordable housing stock | <input checked="" type="checkbox"/> | increasing the access to quality public and private facilities | <input checked="" type="checkbox"/> | the provision of public services concerned with employment |
| <input checked="" type="checkbox"/> | increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability | <input type="checkbox"/> | reducing the isolation of income groups within areas through spatial de-concentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods | <input type="checkbox"/> | the provision of jobs to low-income persons living in areas affected by those programs and activities under programs covered by the plan |
| <input checked="" type="checkbox"/> | increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/AIDS) to live in dignity and independence | <input checked="" type="checkbox"/> | restoring and preserving properties of special historic, architectural, or aesthetic value | <input type="checkbox"/> | availability of mortgage financing for low income persons at reasonable rates using non-discriminatory lending practices |
| <input checked="" type="checkbox"/> | providing affordable housing that is accessible to job opportunities | <input type="checkbox"/> | conserving energy resources and use of renewable energy sources | <input type="checkbox"/> | access to capital and credit for development activities that promote the long-term economic social viability of the community |

Provide a summary of specific objectives that will be addressed during the program year.

Describe the outcome measures for activities in accordance with Federal Register Notice dated March 7, 2006, i.e., general objective category (decent housing, suitable living environment, economic opportunity) an general outcome category (availability/accessibility, affordability, sustainability).

In accordance with Milwaukee County's Consolidated Plan, FY13 funds will be used to address a number of objectives under the decent housing and sustainable communities categories.

Housing Rehabilitation. Given the serious need for affordable housing among people with the lowest incomes, Milwaukee County will continue to support organizations working to address the need for more affordable housing in the urban entitlement County and HOME Consortium. This share of funds allocated to improving housing circumstances is higher than in earlier years of the Consolidated Plan. The shift reflects the intersection of changing demographics, the rising costs of homes and rent, and the ongoing effects of the economic downturn on residents with the lowest incomes. See Table 5 for detail on activities.

Public Infrastructure and Public Facility Improvements. The other significant share of funds will be used to provide a suitable and sustainable living environment for residents with low incomes. As described in Milwaukee County's Consolidated Plan, many communities in which low-income residents reside have significant infrastructure and other community development needs, and this is the area in which Milwaukee County has allocated the bulk of its CDBG funds. See Table 5 for detail on activities.

Public Services. Milwaukee County will support several activities in the Public Service Category. The activities funded aim to provide low income people, no matter where they reside in Milwaukee County, access to services to improve the quality of their lives. Although many of the organizations funded are located in the city of Milwaukee (an Entitlement Community), the activities funded serve the entire county population of Milwaukee County of Milwaukee. See Table 5 for detail on activities.

Economic Development and Employment. Milwaukee County has allocated CDBG funds to support 1) job training and employment services to low income individuals and 2) development services to early stage and existing businesses for the purpose of supporting the creation of higher wage jobs for people in low/moderate income. See Table 5 for detail on activities.

PRIMARY OBJECTIVES AND OUTCOMES

The Consolidated Plan identifies the following priority objectives for both housing and non-housing priority needs:

Housing Priority Objectives:

1. Increase the supply of standard, affordable housing

| Objectives |
|---|
| 1. Providing Rent Assistance |
| 2. Providing New Rental Units |
| 3. Rehabilitating Owner Occupied Housing |
| 4. Providing Accessible Housing for the Physically Disabled |

Non-Housing Priority Objectives:

1. The provision of social services to selected components of the population and assurance of access to these services.

| Objectives |
|---|
| 1. Provide Health and recreational services to a growing elderly and disadvantaged population |
| 2. Assure physical access to services for elderly, disabled, and other special needs populations |
| 3. Provide recreational and educational opportunities for youth, in response to growing numbers of single parent households, households with two wage earners, and those responsible for foster children. |
| 4. Assist crime awareness and drug abuse programs in response to burgeoning urban development in transforming communities. |
| 5. Provide support services for lower income households seeking self-sufficiency. |

2. Improve and Develop Infrastructure

| Objectives |
|---|
| 1. Replace deteriorating streets, alleys, sidewalks, bridges and sewers in lower income areas or in blighted areas. |
| 2. Remove blighting influences through demolition or renovation. |
| 3. Provide new infrastructure to meet demands of a growing or transforming population |
| 4. Work with the private sector to meet infrastructure needs required by lower income citizens |

3. Economic Development and Employment

| Objectives |
|--|
| 1. Provide Assistance to private businesses with the assurance that jobs will be created as a result. |
| 2. Work with private, non-profit organizations to provide lower income persons with employment training. |
| 3. Provide gap-filling employment services necessary for households receiving public assistance to become self-sufficient. |

Description of Activities 91.220(d) and (e)

Description of Activities 91.220 (d) and (e)

Provide a summary of the eligible programs or activities that will take place during the program year to address the priority needs and specific objectives identified in the strategic plan.

Table 6: Summary of eligible activities proposed for the 2013 PY

| SPONSOR | Project | Activity | Location | Priority Need Category | National Objective | HUD Objective | HUD Outcome | Funding Source | Amount |
|-------------------|------------------------------|-------------------------------|-------------------|------------------------|--------------------|--------------------------------------|----------------------------|----------------|-------------|
| City of Cudahy | Handicap Ramp Bus Pad | Public Facilities Improvement | City of Cudahy | Infrastructure | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$30,000.00 |
| City of Cudahy | Program for the Elderly | Public Service | City of Cudahy | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$6,000.00 |
| City of Cudahy | property maintenance program | Public Service | City of Cudahy | Public Service | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$4,800.00 |
| City of Cudahy | Project Concern | Public Service | City of Cudahy | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$6,200.00 |
| City of Franklin | Claire meadows Sidewalk | Public Facilities Improvement | City of Franklin | Infrastructure | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$80,000.00 |
| City of Franklin | Senior Travel | Public Service | City of Franklin | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$5,883.00 |
| City of Franklin | SW interfaith | Public Service | City of Franklin | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$3,381.00 |
| City of Glendale | ADA Sidewalk | Public Facilities Improvement | City of Glendale | Infrastructure | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$31,345.00 |
| City of Greendale | Adult Program Services | Public Service | City of Greendale | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$9,702.00 |

| SPONSOR | Project | Activity | Location | Priority Need Category | National Objective | HUD Objective | HUD Outcome | Funding Source | Amount |
|-------------------------|--|-------------------------------|-------------------------|------------------------|--------------------|--------------------------------------|----------------------------|----------------|-------------|
| City of Greendale | ADA sidewalk and curb ramps | Public Facilities Improvement | City of Greendale | Infrastructure | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$29,383.00 |
| City of Greenfield | continuation of senior citizen program | Public Service | City of Greendale | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$17,209.00 |
| City of Greenfield | Maple Grove Access | Public Facilities Improvement | City of Greendale | Public Facilities | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$62,000.00 |
| City of South Milwaukee | Human Concerns Boiler | Public Facilities Improvement | City of South Milwaukee | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$20,606.00 |
| City of South Milwaukee | Human Concerns Food Purchases | Public Service | City of South Milwaukee | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$3,000.00 |
| City of St. Francis | Trail System | Public Facilities Improvement | City of St Francis | Infrastructure | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$60,000.00 |
| City of St. Francis | Sidewalk Replacement | Public Facilities Improvement | City of St. Francis | Infrastructure | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$50,000.00 |
| City of St. Francis | Sidewalk Replacement Program | Public Facilities Improvement | City of St. Francis | Infrastructure | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$40,000.00 |
| City of St. Francis | Elderly - Interfaith | Public Service | City of St. Francis | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$5,000.00 |

| SPONSOR | Project | Activity | Location | Priority Need Category | National Objective | HUD Objective | HUD Outcome | Funding Source | Amount |
|--|--|-------------------------------|-------------------------------|----------------------------------|--|--------------------------------------|----------------------------|----------------|--------------|
| Hunger Task Force | farm & fish hatchery infrastructure improvement | Public Facilities Improvement | City of Franklin | Public Service | LMC | Creating Suitable Living Environment | Sustainability | CDBG | \$26,280.00 |
| Hunger Task Force | farm & fish hatchery - well pump | Public Facilities Improvement | City of Franklin | Public Service | LMC | Creating Suitable Living Environment | Sustainability | CDBG | \$16,496.00 |
| Legal Aid Society of Milwaukee | Foreclosure Mediation Project | Public Service | Milwaukee County Jurisdiction | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$21,000.00 |
| Metropolitan Milwaukee Fair Housing | Fair Housing education and outreach | Public Service | Milwaukee County Jurisdiction | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$35,000.00 |
| Milwaukee County DHHS-Housing Division | Residential Architectural Barrier Removal | Housing Rehabilitation | Milwaukee County Jurisdiction | Owner or renter occupied housing | LMH - improvement residential structures for LMI | Providing Decent Housing | Availability/Accessibility | CDBG | \$120,000.00 |
| Milwaukee County DHHS-Housing Division | Emergency home repair | Housing Rehabilitation | Milwaukee County Jurisdiction | Owner occupied housing | LMC | Providing Decent Housing | Availability/Accessibility | CDBG | \$60,000.00 |
| Milwaukee County DHHS-Housing Division | DHHS/Suburban Home Repair | Housing Rehabilitation | Milwaukee County Jurisdiction | Owner occupied housing | LMH - improvement residential structures for LMI | Providing Decent Housing | Availability/Accessibility | CDBG | \$125,025.00 |
| Rebuilding Together Greater Milwaukee | Revitalization project for vulnerable homeowners | Housing Rehabilitation | Milwaukee County Jurisdiction | Owner occupied housing | LMH - improvement residential structures | Providing Decent Housing | Availability/Accessibility | CDBG | \$95,197.00 |

| SPONSOR | Project | Activity | Location | Priority Need Category | National Objective | HUD Objective | HUD Outcome | Funding Source | Amount |
|---------------------------|--------------------------------------|-------------------------------|---------------------------|------------------------|--|--------------------------------------|----------------------------|----------------|--------------|
| | | | | | for LMI | | | | |
| St. Mary's | Marian Center Housing Development | Housing Rehabilitation | City of St. Francis | Rental Housing | LMH - improvement residential structures for LMI | Providing Decent Housing | Affordability | CDBG | \$100,000.00 |
| Village of Bayside | Public Service - Senior Services | Public Service | Village of Bayside | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$5,598.00 |
| Village of Brown Deer | senior citizens center - senior club | Public Service | Village of Brown Deer | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$25,017.00 |
| Village of Shorewood | Senior Resource Center | Public Service | Village of Shorewood | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$10,000.00 |
| Village of Shorewood | Water Main Replacement | Public Facilities Improvement | Village of Shorewood | Infrastructure | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$21,614.00 |
| Village of Shorewood | Shoreline Interfaith | Public Service | Village of Shorewood | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$2,500.00 |
| Village of West Milwaukee | community center improvements | Public Facilities Improvement | Village of West Milwaukee | Public Facilities | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$32,000.00 |
| Village of West Milwaukee | maintenance of community center | Public Facilities Improvement | Village of West Milwaukee | Public Facilities | LMA | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$9,000.00 |

| SPONSOR | Project | Activity | Location | Priority Need Category | National Objective | HUD Objective | HUD Outcome | Funding Source | Amount |
|---|--|---|-------------------------------|---------------------------------------|--|--------------------------------------|----------------------------|----------------|--------------------|
| Wisconsin Community Services, Inc | Center for Driver's License Recovery and Employability | Public Service | Milwaukee County Jurisdiction | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$25,000.00 |
| Wisconsin Community Services, Inc | Job Training | Public Service | Milwaukee County Jurisdiction | Public Service | LMC | Creating Suitable Living Environment | Availability/Accessibility | CDBG | \$23,289.00 |
| Wisconsin Preservation Fund | Housing Development | Housing Rehabilitation | Milwaukee County Jurisdiction | Rental Housing | LMH - improvement residential structures for LMI | Providing Decent Housing | Affordability | CDBG | \$113,000.00 |
| Wisconsin Women's Business Initiative Corp. | microenterprise development continuum | Direct ED Assistance to Private for profit enterprise | Milwaukee County Jurisdiction | 3 - Economic Development & Employment | LMC | Economic Opportunities | Availability/Accessibility | CDBG | \$60,000.00 |
| Total | | | | | | | | | \$1,644,102 |

Geographic Distribution/Allocation Priorities

Geographic Distribution/Allocation Priorities 91.220(d) and (f)

Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

Description of Geographic areas of jurisdiction

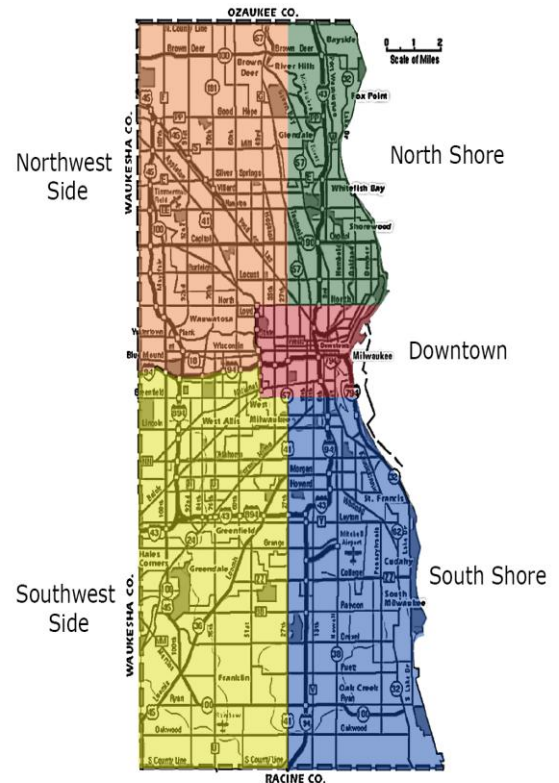
Milwaukee County covers 242 square miles of land in southeastern Wisconsin and comprises 19 municipalities, including the city of Milwaukee. Milwaukee County is Wisconsin's largest county by population in Wisconsin and is the 44th largest county in the United States. As an "Urban Entitlement" county under the CDBG program, funds are to be directed to the low-income residents of Milwaukee County's 16 municipalities that are part of the Urban County (the cities of Milwaukee, West Allis and Wauwatosa are entitlement communities). Milwaukee County seat is the city of Milwaukee.

The map to the right breaks Milwaukee County into four Districts. The North Shore consists of the more affluent Districts of Bayside, Fox Point and River Hills; the South Shore consists of older manufacturing cities of Cudahy, South Milwaukee and St. Francis; the Southwest consists of Franklin, Greenfield and Greendale.

In regards to community development, the Urban County's most pressing needs are in the South Shore portion of Milwaukee County. The table below provides a general indication of how CDBG funds will be dispersed geographically throughout Milwaukee County. The South Shore has the largest population, the greatest level of poverty and is receiving 44% of CDBG funds to dedicated Municipalities.

| Geographic Area | Number of Communities | % of Population | % of poverty | % of allocation |
|-----------------|-----------------------|-----------------|--------------|-----------------|
| North Shore | 7 | 26% | 5.3% | 38% |
| South Shore | 5 | 47% | 7.1% | 28% |
| Southwest | 4 | 26% | 5.9% | 33% |

Milwaukee County Plan Districts



Milwaukee County Demographics

New census and employment data provide an updated picture of Milwaukee County residents and allow us to compare the situations of residents with residents across the state and country and track changes in County demographics over time. When available, we use data specific to the urban entitlement communities – Milwaukee County’s townships. In many cases, however, data is available only for Milwaukee County as a whole.

Population and Race

U.S Census data show that Milwaukee County’s population grew by 2% 2000 to 2009. The urban entitlement portion of Milwaukee County grew by 5% during 2000 to 2009, for a total population of 245,532. Minority groups accounted for 85% of the growth in population in the 16 communities that comprise the Urban County.

In general, growth was concentrated in the Municipalities in Milwaukee County’s southern tier; the City of Franklin claimed the highest percent increase of 25%, Oak Creek the second highest at 19% and St. Francis at 14%. This geographic concentration of growth continues the trend of the past two decades, during which time Milwaukee County’s suburban municipalities have become an affordable residential alternative to city of Milwaukee.

Selected Demographics of Milwaukee County (outside of Milwaukee Wauwatosa and West Allis)

| | Milwaukee County (whole) | Urban County | USA |
|--|-----------------------------|-----------------|--------------------|
| Population | | | |
| Total Population | 953,864 | 245,532 | 301,461,533 |
| Gender | | | |
| Male (%) | 48.2% | 48.9% | 49.3% |
| Female (%) | 51.8% | 51.1% | 51.1 |
| Race | | | |
| White persons | 63.8% | 88.9% | 74.5% |
| Black persons | 25.2% | 4.3% | 12.4% |
| American Indian/Alaska native persons | 0.6% | 0.5% | 0.8% |
| Asian persons | 3.1% | 3.0% | 4.4% |
| Persons reporting two or more races | 2.1% | 1.7% | 5.6% |
| Person of Hispanic or Latino origin | 11.5% | 5.1% | 15.1% |
| Age | | | |
| Under 5 | 7.6% | 6.4% | 6.9% |
| 18 years and over | 74.6% | 77.4% | 75.4 |
| 65 years and older | 11.7% | 15.4% | 12.4% |

Low-Income Persons**Poverty Status of Milwaukee County residents (Outside of Milwaukee, West Allis and Wauwatosa)**

| | % Below Poverty Level | |
|--|-------------------------------------|---------------------|
| | Milwaukee County (whole) | Urban County |
| Population | | |
| Total Population | 17% | 6.5% |
| Gender | | |
| Male (%) | 16.3% | 5.5% |
| Female (%) | 19.6% | 7.3% |
| Race | | |
| White persons | 9.0% | 5.0% |
| Black persons | 35.4% | 14.0% |
| American Indian/Alaska native persons | 25.5% | 17.0% |
| Asian persons | 17.5% | 11.0% |
| Persons reporting two or more races | 21.1% | 15.0% |
| Person of Hispanic or Latino origin | 25.3% | 12.0% |
| Age | | |
| Under 18 Years | 26.4% | 6.7% |
| 18 - 64 years and older | 15.9% | 6.2% |
| 65 years and older | 10.7% | 7.3% |

Areas of low-income families and/or racial/minority concentration

The Milwaukee Urban County municipalities have a wide range of poverty rates, ranging from a high of almost 18% in West Milwaukee to a low of 2.1% in Bayside. Poverty in the municipalities of the Urban County is primarily located on the south east side of Milwaukee County; municipalities along the North shore have much lower levels of poverty.

| Municipality | Poverty Rate | Municipality | Poverty Rate |
|---------------------|---------------------|---------------------|---------------------|
| West Milwaukee | 17.6% | Hales Corners | 5.4% |
| Cudahy | 12.2% | Greenfield | 4.7% |
| Shorewood | 9.9% | Franklin | 4.1% |
| South Milwaukee | 8.8% | Whitefish Bay | 2.6% |
| St. Francis | 8.0% | River Hills | 2.5% |
| Greendale | 6.5% | Fox Point | 2.3% |
| Glendale | 6.2% | Bayside | 2.1% |
| Oak Creek | 6.1% | | |
| Brown Deer | 5.8% | | |

Distribution of CDBG funds in jurisdiction

Since 1979, the formula for allocating CDBG funds to municipalities has been unchanged: 40% of CDBG funds are allocated to non-profits having a county-wide impact, 40% of CDBG funds are allocated to the municipalities for eligible activities and 20% of CDBG funds are allocated to Milwaukee County to administer the program.

The process for selecting non-profit activities is different than the process for selecting municipality activities; the biggest difference being that the non-profit application process is competitive and the amount of allocation to municipalities is determined by a formula. At the end of the process all activities approved for municipalities and non-profits must be an eligible activity and must meet a National Objective.

Ranking Non-profit activities

Since 1979, non-profits submit applications in a competitive allocation process. Milwaukee County's application Review Team evaluates the applications to determine eligibility and rank based on the following process:

A. Determine Project Eligibility: Staff reviews all proposed projects to determine the following:

- Sufficient information from applicant describing the project; project location, population served, proposed budget, schedule of work.
- Sufficient information from applicant on agency information; mission, non-profit determination, articles of incorporation/by-laws, audit, board and staff list.
- Proposed projects must meet the following eligibility requirements:
 1. No for-profit organizations will be directly funded.
 2. No improvements or rehabilitation will be funded for leased facilities unless the facility is owned by a non-profit group.
 3. No non-County governmental organizations will be funded.
 4. There will be no funding for the arts, except rehabilitation of a facility related to the arts, subject to Item 3 above.
 5. There will be no direct funding of child day care centers. Facilities that are multi-purpose centers but include child day care can apply for funding for facilities that are not used for day care.
 6. Facilities used as alternative public schools will not be funded.
 7. Funds cannot be used for community organizing.
 8. Non-profit agencies that have not been in existence and providing services for at least two years will not be funded.
 9. No non-profit organization already receiving funding from Milwaukee County, will be eligible for CDBG funding.

B. Evaluating Ranking Proposals

Staff reviewed and rated all proposed activities based on the following criteria:

1. **Project Approach (25 points maximum):** The application describes what the program/project will do; how it will be implemented, operated, and administered within a realistic time period; and how low-income participants will access services. The description should include:
 - A description of the work that will be undertaken and a description of how the work will address the identified problem (worth up to 10 points).
 - Identifies any partnerships that have been or will be formed to ensure the success of the project. (Worth up to 5 points).
 - A work plan for how the project/program will be organized, implemented, operated, and administered, and the timeline and milestones from initiation to completion. Work on the project – meaning funds will be spent – will begin 2013 (worth up to 5 points).
 - Outreach and marketing initiatives that will be implemented to inform potential participants and to ensure that they are aware of the services/activities to be provided (worth up the 5 points.)
 - Outcomes are identified and can reasonably be expected to be achieved (worth up to 5 points).
2. **Jurisdiction (20) points maximum:** To what degree does the project impact the Milwaukee County jurisdiction? If sub-recipient has a history of serving the jurisdiction (10) points; if project is located in jurisdiction (5); does the proposal talk about serving jurisdiction or outreach into jurisdiction (5 points).
3. **Experience and Qualifications (15 points maximum):** The application provides documentation to justify the organization's capacity to conduct this project. The project is consistent with the mission of the organization. The organization has undertaken projects of similar complexity to the one for which funds are being required (worth up to 3 points). There are staff resources with the skills and experience to administer and conduct an accountable and responsible project (worth up to 10 points). There appears to be adequate board and management oversight along with a commitment to quality and service improvement (worth up to 2 points).
4. **Need and Justification (15 points maximum):** The proposed activity overview adequately describes the problem that is being addressed by the proposed project (worth up to 5 points). Statements are substantiated and related to the needs and the priorities in the 2010 – 2014 Consolidated Plan (worth up to 5 points). Provides a description of how funds may be targeted to areas of greatest need (worth up to 10 points)
5. **Past Performance (15 points maximum):** If the organization has been previously funded, a review of past expenditures and performance shows that the organization has been able to meet timeless and goals in a reasonable fashion, i.e., no unexpended dollars from 2010. Compliance with the contract will include but not be limited to submission of reports and adherence to scope of services (Worth up to 10 points with maximum points being awarded to projects.)

6. **Benefit to Low-and-Moderate Income Persons (5 points maximum):** The application describes the population to be served. Additional points will be given to projects located in census tracts where 42.9% of the population is considered low-and-moderate income.
7. **Budget and Other Sources of Funds (5 points maximum):** The application clearly explains and justifies each proposed budget line item and why CDBG and/or HOME funding is required to make the project viable. The budget is realistic. Efforts have been made to secure other funding for the project. The application identifies eligible sources of match, if required.

In making the a decision to fund an activity outside of the jurisdiction, Milwaukee has established a process to ensure that 1) the activity is necessary to further the purposes of the CDBG program and Milwaukee County's community development objectives, 2) that reasonable benefits from the activity will accrue to residents within the jurisdiction of Milwaukee County and 3) the basis for the for the decision is sufficiently documented for HUD.

Following is a list of non-profit organizations that are located outside of the Milwaukee County jurisdiction but they have a County-wide service area. A explanation exists on the reason why Milwaukee County chose to fund these agencies, why their activities are necessary to further the purposes of the CDBG program and Milwaukee County's objectives, and the reasonable benefits that will accrue to residents within the jurisdiction.

Non-Profit Activities proposed Outside of Jurisdiction

| Organization Name | Activity | Necessity of Activity | Reasonable Benefits for Residents | Documentation |
|--|--|---|--|--|
| Wisconsin Community Services, Inc. (WCS) | Center for Driver's License Recovery and Employability Job Training | Agency provides a unique service by providing support for LMI people to obtain their driver's license, which will move these people closer to self-sustainability. Given limited public transit options and the fact that poverty in the jurisdiction has grown at of over 50% in the past year, this service is increasingly in demand. Gaining employment stabilizes communities in jurisdiction, and makes them safer. | 100% of the clients served will reside from the Milwaukee County jurisdiction at least 42.9% will be LMI residents. The percentage of CDBG funds to total budget for the program will be in proportion to the number of clients served from the jurisdiction. | Sub-recipient will document income eligibility and jurisdictional impact via the Milwaukee County Income Eligibility Form. All clients will be required to complete form. |
| Wisconsin Women's Business Initiative Corp | Business Owner - Microenterprise Development | Minority owned firms face significant obstacles in accessing capital and growing business. Yet these firms - small businesses - account for most of the job growth. WWBIC provides business technical assistance and these businesses then hire LMI people. | Agency serves Milwaukee County jurisdiction. 100% of the clients served will reside from the Milwaukee County jurisdiction at least 42.9% will be LMI residents. The percentage of CDBG funds to total budget for the program will be in proportion to the number of clients served from the jurisdiction. | Sub-recipient will document income eligibility and jurisdictional impact via the Milwaukee County Income Eligibility Form and job creation forms for economic development projects. All clients will be required to complete form. |
| Legal Aid Society | Foreclosure Mediation Project | The foreclosure crisis has displaced many families in the jurisdiction. Agency assists low income residents residing within the jurisdiction in mediating with financial institutions to stop the foreclosure process. Efforts prevent displacement and homelessness of LMI people. | Agency serves Milwaukee County jurisdiction. 100% of the clients served will reside from the Milwaukee County jurisdiction at least 42.9% will be LMI residents. The percentage of CDBG funds to total budget for the program will be in proportion to the number of clients served from the jurisdiction. | Sub-recipient will document income eligibility and jurisdictional impact via the Milwaukee County Income Eligibility Form. All clients will be required to complete form. |
| Rebuilding Together Greater Milwaukee | Revitalization project for vulnerable homeowners | Agency provides a unique service by providing housing rehab services, for free, to qualified elderly home-owners residing in jurisdiction. Agencies rehab improves the quality of life for the elderly by improving safety in homes. | 100% of the clients served will reside from the Milwaukee County jurisdiction at least 42.9% will be LMI residents. The percentage of CDBG funds to total budget for the program will be in proportion to the number of clients served from the jurisdiction. | Sub-recipient will document income eligibility and jurisdictional impact via the Milwaukee County Income Eligibility Form. All clients will be required to complete form. |

Allocation to Municipalities

Each CDBG Program cycle, the Department allocates 40% of its annual CDBG entitlement to the municipal CDBG Consortium.

Milwaukee County Urban County

Since 1979, all municipalities in Milwaukee County - except for the Entitlement Communities of Milwaukee, West Allis and Wauwatosa - have been included in the Urban County. Community participation in the Urban County partnership in Milwaukee County include about 225,000 or about 27% of the total County population.

Participating Municipalities included:

| | |
|-----------------------|---------------------------|
| Bayside, Village of | Hales Corners, Village of |
| Brown Deer, City of | Oak Creek, City of |
| Cudahy, City of | River Hills, Village of |
| Fox Point, Village of | Shorewood, Shorewood |
| Franklin, City of | South Milwaukee, City of |
| Glendale, City of | St. Francis, City of |
| Greendale, Village of | West Milwaukee County |
| Greenfield, City of | Whitefish Bay, Village of |

Fund Allocation Model

Milwaukee County distributes half of its non-administrative CDBG funds to municipalities. The allocation is based on an allocation model agreed to by the Urban County Consortium and Milwaukee County. The allocation formula is essentially incorporates three factors to calculate the allocation of funds to municipalities:

- 1) **Equal Share** – each municipality gets 1/16 of one third of the total allocation amount – if the total allocation amount is \$600,000, then a municipality is guaranteed $(\$200,000 \times 1/16)$ \$12,500;
- 2) **Percent of total poverty in the Urban County** - each municipality gets an allocation of 1/3 of CDBG funds based on its percentage of total poverty in the Urban County - if the total allocation is \$600,000, then a municipality is guaranteed $(\$200,000 \times \text{poverty percentage})$. For example, for the Village of Bayside, the allocation would yield $(\$200,000 \times 0.6\%)$ \$1,173.
- 3) **Percent of total population in the Urban County** - each municipality gets an allocation of 1/3 of CDBG funds based on its percentage of total population in the Urban County - if the total allocation is \$600,000, then a municipality is guaranteed $(\$200,000 \times \text{population percentage})$. For example, for the village of Bayside, the allocation would yield $(\$200,000 \times 1.8\%)$ \$3,584.
- 4) **Total CDBG for a Municipality equals the sum of all three factors.** For example, the allocation for the Village of Bayside is project to be \$17,257.

HOME Funds

The HOME funds application process is intentionally designed to be application based. Applicants apply because they need assistance and, if they meet the income criteria; housing programming is made available to them. Programs that are applicant based are the best means of maintaining the quality of the existing housing stock as well as maintaining neighborhood stability.

Describe the reasons for the allocation priorities, the rationale for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) during the next year, and identify any obstacles to addressing underserved needs.

The allocation of CDBG funds in Milwaukee County is based on community needs and priorities. The *2010-2014 Consolidated Plan* provides complete detail on the process for collecting and prioritizing needs and developing objectives to meet those needs. The narrative reflects how Milwaukee County sought input from non-profit service providers, local jurisdictions, county departments, and interested individuals to identify and assess community development needs. Project proposals are accepted annually from local governments and non-profit organizations. Proposals are evaluated by Milwaukee County Review Panel and ranked in order based on their scores. The activities that receive the highest scores and are within the funding limits in each category are then selected for funding.

The Cooperation Agreements currently in force with the 16 local communities participating in the Urban County in program year 2013 provide that at least 40% of our annual CDBG allocation is made available to finance a Municipal Grant Program for eligible community development activities within the Milwaukee County Urban County jurisdiction. This commitment is honored and managed through an application process that is open and available to all Urban County participating communities. The cooperative framework between Milwaukee County and the participating municipalities places a high value on ensuring local control and prioritization of eligible activities at the municipal level.

Obstacles to addressing underserved needs

Despite Milwaukee County's social service agencies, housing providers, neighborhood organizations, and community & economic development agencies efforts, there still remains a number of significant obstacles to meeting Milwaukee County's underserved needs. The following obstacles restrict Milwaukee County from meeting all the needs of its low-income residents:

- Lack of decent, safe, sound, affordable, and accessible owner occupied housing for low-income families.
- Lack of decent, safe, sound, affordable, and accessible rental housing for low-income families.
- The amount of foreclosed and abandoned housing that affects the vitality of residential neighborhoods.
- An aging population, increasing need for assisted living housing and the increased need for removal of architectural barriers in the City's older housing stock.
- An older existing housing stock that is in need of major rehabilitation work to bring them up to code standards.
- A lack of jobs that pay a family supporting wage.
- A highly trained workforce with the skills needed by companies in emerging industries.
- Funding Uncertainty: Decrease in the amount of Federal financial assistance for CDBG, HOME, ESG, and HOPWA funds each year. For the current application process, Milwaukee County received notices of intent to apply for funds totaling more than \$2 million, against an allocation of \$1.2 million.
- A mismatch between access to affordable housing and job opportunities; most job growth is taking place in the suburbs but there is little affordable housing opportunities in those communities.

Affordable Housing Goals 91.220 (g)

Describe the one-year goals for the number of homeless, non-homeless, and special-needs households to be provided affordable housing using funds made available to the jurisdiction and one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the jurisdiction. The term affordable housing shall be defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership.

Please refer to Table 3B

Public Housing 91.220 (h)

Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

Milwaukee County does not own or manage Public Housing units.

Needs of Public Housing

Public Housing

The City of South Milwaukee operates the only traditional public housing in the jurisdiction, a 60 unit development. The City of West Allis owns and operates 104 units of 55 and older income based independent living housing. Several other HPA communities have public housing authorities, but no housing units. There are no plans to change the status of these units.

Section 8 Rent Assistance

The Housing Division manages the Section 8 Housing Choice Voucher Program, a tenant based rental assistance program funded by HUD. The Section 8 Program is the primary program available to assist extremely low-income households. While the number of households the Section 8 Program can assist decreases, the cost burden for extremely low-income and very low-income households continues to increase.

Milwaukee County has received allocations totaling 2,042 vouchers. West Allis has received 457 vouchers. Turnover in Milwaukee County program (caused by tenants becoming ineligible, moving from a jurisdiction, death, or other reasons) accounts for the difference between the assistance available and that allocated. Approximately 1,598 County, and 30 West Allis, vouchers are used by recipients who live in the City of Milwaukee. Currently, there are approximately 600 households on the Housing Choice Voucher waiting list.

The Section 8 Program last took applications for rental assistance in 2008. The Section 8 Program hopes to take applications again at the end for 2013.

Two governments (Milwaukee County and the City of West Allis) operate Rent Assistance programs in the HPA. (The City of Milwaukee also participates in this federal program.)

Homeless and Special Needs (i)

Public Housing Strategy

Milwaukee County's strategies for addressing housing needs of lower income households will include the following:

- The Housing Division will continue to provide the Section 8 Housing Choice Voucher Program. The program will primarily target assistance to extremely low-income households.
- The Housing Division will continue to work to increase funding to enable the Housing Division to assist all 2,042 households authorized under the existing Housing Choice Voucher contract authority and pursue additional units when funding is made available through HUD.
- The Housing Division will provide referrals and act as a liaison to other City programs, such as home purchase, housing rehabilitation, and lead-based paint programs.
- The Housing Division will work with the County to implement its affordable housing policies and continue to advocate on behalf of extremely low-income and very low-income households.
- The Housing Division will continue to provide referral services to connect clients with special needs to agencies that can provide supportive services.

- 1. Sources of Funds—identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.**

| | | |
|---|--|--|
| Homeless Prevention and Rapid Re-Housing Program (HPRP) | \$712,755 | The fund is used to fund a Case Management position, provide medium term rental assistance and to provide security deposits for eligible applicants. |
| Shelter Plus Care program | \$2.8 million | Tenant-based program: |
| | \$1.1 million over a five-year period. | sponsor based Shelter Plus Care (Partnership with Mercy Housing) |

| | | |
|---|------------------------------------|--|
| | \$433,000 over a five-year period. | sponsor based Shelter Plus Care grant (partnership with Heartland Housing) |
| CDBG Project Funding | \$13,860 | Housing Counseling |
| Safe Haven Program | \$420,000 | Provide soft entry housing program that provides housing to homeless individuals who are not yet connected to treatment. |
| ESG Funds (through Community Advocates) | \$80,000 | The funds used to provide security deposits and short-term rental assistance to individuals with a disability. |

Homeless funding priorities are primarily based on consultation with homeless service providers and a review and analysis of homeless-specific strategies such as the Continuum of Care's annual funding application and the 10 Year Plan to End Homelessness. Milwaukee County's specific annual goals and actions for 2013 are described below.

2. Homelessness—In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps

All homeless strategies will be conducted in coordination with Community Advocates, the lead agency for the local Continuum of Care (CoC). The CoC is an umbrella organization that coordinates homeless services provided in all of Milwaukee County. In 2009, Milwaukee County participated in the development of a 10-year Plan to End Homeless. The Plan was sponsored by CoC.

Following are specific strategies identified in the 10-year Plan and information on how this Action Plan will address the priority needs identified in the 10-year Plan.

Strategy: Homeless Prevention

Milwaukee County will coordinate with the CoC to provide counseling services and financial assistance to households facing homelessness. Milwaukee County will also work with the Continuum to monitor the success of discharge policies that address the risk of homelessness upon release of public institutions and other facilities.

Strategy: Emergency Shelter & Transitional Housing

Emergency shelters and transitional housing form the core of the continuum of the homeless service system. Milwaukee County will continue to provide operational support to emergency shelters and transitional housing facilities to move homeless families and individuals to permanent supportive housing and independent living. Milwaukee County will work with the Continuum to ensure that necessary supportive services are available to homeless persons.

Strategy: Permanent Supportive Housing Development

One of the Continuum's goals to address chronically homeless persons is the creation of additional permanent supportive housing units. All development and rehabilitation of permanent supportive housing will be addressed through the Affordable Housing Program. Under the Affordable Housing Program, Milwaukee County will provide additional consideration to activities that serve homeless families and individuals and households earning less than 30% of median area income.

Strategy: Permanent Supportive Housing Rental Assistance

Milwaukee County is working with a consultant to implement the use of HOME funding for a tenant-based rental assistance program. This will be the first year HOME funds will be set aside for TBRA. Funds will be used for security deposits for Section 8 clients coming off the waiting list or living in units that fail inspection wishing to move to the suburbs.

Potential obstacles to completing these action steps:

- Milwaukee County must maintain a good working relationship with the CoC. A good working relationship ensures a consensus on actions and goals.
- Continued funding for Permanent Supportive Housing. The need for Supportive Housing is enormous and is growing. A greater commitment of resources over a longer period of time will expand our capacity to meet this need.

3. Chronic homelessness—The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness. Again, please identify barriers to achieving this.

The chronically homeless is the highest priority homeless subpopulation for both the Consolidated Plan and the Continuum of Care. HUD defines the chronic homeless population as unaccompanied homeless individuals with a disabling condition, who have either been continuously homeless for a year or more or have had at least four episodes in the past three years, and have been sleeping in a place not meant for human habitation and/or in an emergency homeless shelter. Disabling conditions include substance use, mental illness, developmental disability, or chronic physical illness or disability.

Many of the existing shelters and programs are not designed or equipped to adequately address the issues involving the severity of disabilities (often multiple) of this population. This system disconnect intensifies this population's condition of poverty and isolation, leading to serial or chronic homelessness.

The Milwaukee Continuum of Care proposes a three-prong strategy to address chronic homelessness:

Outreach to chronically homeless individuals that will engage individuals in activities to meet basic needs, access community services, engage in treatment for health, mental health, and addiction issues, apply for benefits for which they are eligible, and utilize available housing resources. The building of a strong trusting relationship is critical to the willingness of many chronically homeless persons to become familiar with the services system.

Permanent supportive housing that will provide affordable, safe housing with on-site or quickly accessible supportive services including case management, peer support, and access to health, mental health, and addiction treatment.

Income generation through one of two mechanisms: a) receipt of SSI/SSDI through the provision of intensive SSI/SSDI application and advocacy services; or, b) engagement in job readiness, skills development, and employment through specially tailored homeless employment initiatives as well as through the regular employment market. This strategy is included as a major element of the Continuum's *10-Year Plan to End Homelessness*.

Potential obstacles to completing these action steps:

- Milwaukee County must maintain a good working relationship with the CoC. A good working relationship ensures a consensus on actions and goals.
- Continued funding for Permanent Supportive Housing. The need for Supportive Housing is enormous and is growing. A greater commitment of resources over a longer period of time will expand our capacity to meet this need.

- Maintaining a high level of coordination among the various agencies, shelters and organizations involved in the provision of services to the homeless.

4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless:

The Milwaukee Continuum of Care has redesigned its homelessness prevention strategy to create a stronger early intervention system to keep people housed. This strategy is incorporated into the *10-Year Plan to End Homelessness* and is the foundation for Milwaukee's Homeless Prevention and Rapid Re-Housing Program. The strategy includes the following elements:

- **Landlord/tenant mediation** including dispute resolution, case management and the provision of short-term rental assistance to individuals and families who are at imminent risk of eviction and homelessness.
- **Legal services** including eviction prevention assistance to low-income renters who are at risk of homelessness due to nonpayment of rent, foreclosure, or other circumstance.
- **Prevention of homelessness related to foreclosure of rental units** by providing assistance to Section 8 households which are subject to 5-day eviction orders as a result of foreclosure on the unit in which they are residing.
- **Development of a discharge coordination policy.**
- **Redesign and implementation** of an effective **central intake/referral/diversion system** that will effectively and appropriately redirect individuals and families to utilization of family and community supports to prevent homelessness and a resulting shelter stay when those resources are available.

5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy:

Milwaukee County Behavioral Services provides a model of proactive discharge planning and service coordination that has been replicated around the country. The challenge now is to align other institutions' policies and practices accordingly. Should a person be chronically homeless and need psychiatric stabilization, they will return to or be admitted to a homeless funded program. Milwaukee's BHD's planned Access to Recovery Network, a collaborative of the Wisconsin Department of Corrections and the BHD will provide reintegration planning for ex-offenders re-entering the community and funding to provide housing for these individuals.

The Milwaukee Continuum of Care *10-Year Plan to End Homelessness* includes a specific goal and objective relating to the development of a discharge coordination policy that will prevent homelessness resulting from discharge from foster care, health care facilities, mental health facilities and corrections.

The Prevention and Emergency Services Work Group of the 10-Year Plan has included discharge planning as one of its top priorities for its package of recommendations for inclusion in the final 10-Year Plan. The relevant goal recommended by the Prevention and Emergency Services Work Group is "To stabilize at-risk individuals and families to prevent homelessness." The specific corresponding objective is "To target prevention efforts to people leaving institutional settings including psychiatric inpatient care, corrections, hospitals, and foster care through the establishment of a discharge coordination policy."

The planned strategy for achieving a community-wide discharge coordination policy is to address one major system each year starting with the Bureau of Milwaukee Child Welfare foster care system (2010) and moving to mental health facilities, health care facilities and corrections in subsequent years (2013-2013).

Community Development

Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table, public facilities, public improvements, public services and economic development:

The Jurisdiction's non-housing community development needs eligible for assistance by CDBG eligibility were identified in the Consolidated Plan

The provision of social services to selected components of the population and assurance of access to these services.

| Objectives | Outcomes |
|---|---|
| 1. Provide Health and recreational services to a growing elderly and disadvantaged population | <ul style="list-style-type: none"> • Develop, through new construction, rehabilitation, or expansion, one new senior center facility. • Assist, through, renovation, expansion or construction, with facilities serving youth. • Renovate or expand health care facilities serving primarily lower income, disadvantage persons. • Provide health and recreational services to senior citizens. • Assist activities that will provide services, accessibility services and programs to disabled persons. • Provide recreational, educational and health services to youth. • Provide health services to senior citizens. |
| 2. Assure physical access to services for elderly, disabled, and other special needs populations | |
| 3. Provide recreational and educational opportunities for youth, in response to growing numbers of single parent households, households with two wage earners, and those responsible for foster children. | |
| 4. Assist crime awareness and drug abuse programs in response to burgeoning urban development in transforming communities. | |
| 5. Provide support services for lower income households seeking self-sufficiency. | |

Improve and Develop Infrastructure

| Objectives | Outcomes |
|---|--|
| 1. Replace deteriorating streets, alleys, sidewalks, bridges and sewers in lower income areas or in blighted areas. | <ul style="list-style-type: none"> • Develop, through construction, rehabilitation or expansion, additional recreational facilities. • Renovate or demolish major blighting influences. • Assist activities that will construct, reconstruct or |
| 2. Remove blighting influences through demolition or renovation. | |
| 3. Provide new infrastructure to meet demands of a growing or transforming population | |

| | |
|--|---|
| 4. Work with the private sector to meet infrastructure needs required by lower income citizens | resurface local sidewalks, streets and sewers. • Work with non-profit organizations to assist with supplementing the provision of needed facilities. |
|--|---|

Economic Development and Employment

| Objectives | Outcomes |
|--|---|
| 1. Provide Assistance to private businesses with the assurance that jobs will be created as a result. | • Provide employment training for lower income individuals • Create jobs for lower income individuals with wages that can support a family • Identify and provide gap-filling services for households attempting to become self-sufficient. |
| 2. Work with private, non-profit organizations to provide lower income persons with employment training. | |
| 3. Provide gap-filling employment services necessary for households receiving public assistance to become self-sufficient. | |

Identify specific long-term and short-term community development objectives developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program

Milwaukee County's primary short-term objective is to arrest the decline and stimulate investment in low- and moderate-income areas through structural improvements, economic development activity, and provision of needed public services. The overall long-term objective is to create viable living environments that feature a high quality of life, affordable housing, and economic opportunities.

Each community development strategy includes both short-term and long-term objectives and performance outcomes designed to meet CDBG's overall objectives of creating a more suitable living environment and expanding economic opportunities primarily for households earning less than 80% of the area median income. CDBG funds will also be used for the general administration of the program.

Strategy: Facilities and Infrastructure Improvements

Milwaukee County will invest CDBG funds in activities that provide new and improved public facilities and infrastructure in CDBG-eligible areas. Part of this strategy is to focus investments in areas where at least 60% of the households are low- and moderate income or where Milwaukee County determines there is an overwhelming need for community investment.

Milwaukee County currently qualifies as an exception community, meaning that Milwaukee County may invest CDBG funds in areas where at least 49.2% of the households earn less than 80% of the area median income.

In 2013, Milwaukee County will provide \$508,724 of CDBG funding to the following activities under this strategy.

Public Facilities - General Amount

| | |
|-------------------------|-------------|
| Hunger Task Force | \$42,776.00 |
| City of South Milwaukee | \$20,606.00 |

Community Facilities

| | |
|---------------------------|-------------|
| Village of West Milwaukee | \$32,000.00 |
| Village of West Milwaukee | \$9,000.00 |

Parks, Recreational Facilities

| | |
|---------------------|-------------|
| City of St. Francis | \$60,000.00 |
|---------------------|-------------|

Transit improvements

| | |
|----------------|-------------|
| City of Cudahy | \$30,000.00 |
|----------------|-------------|

Street/Street Improvements

| | |
|-----------------------------------|-------------|
| City of Franklin | \$80,000.00 |
| City of Glendale | \$31,345.00 |
| City of St. Francis | \$40,000.00 |
| Village of Shorewood | \$21,614.00 |
| City of Greendale | \$29,383.00 |
| City of Greenfield | \$62,000.00 |
| St Francis – Sidewalk Replacement | \$50,000.00 |

Strategy: Housing Services

Milwaukee County will provide CDBG assistance to non-profits and public agencies to provide housing-specific public services that make decent, affordable housing more affordable and accessible to low- and moderate-income households. Eligible types of programs include but are not limited to housing counseling, foreclosure prevention, and fair housing activities. All eligible programs must satisfy the regulatory requirements of the CDBG program and be designed to primarily serve households earning less than 80% of the area median income. Eligible uses include but are not limited to staff salaries, and other operating costs.

In 2013, Milwaukee County will provide \$674,022 of CDBG to the following activities under this strategy.

Housing Counseling Services Amount

Legal Aid Society \$21,000

Fair Housing Activities Amount

Metro Milwaukee Fair Housing Council \$35,000

Property Inspection

City of Cudahy \$4,800

Single Family Rehabilitation Administration

Milwaukee County Housing Division \$120,000

Rebuilding Together Greater Milwaukee \$95,197

Milwaukee County - Suburban \$125,025

Emergency Home Repair

Milwaukee County Housing Division \$60,000

Affordable Housing

St. Mary's – Marian Center \$100,000

Wisconsin Preservation Fund \$113,000

Strategy: Social Services

Milwaukee County will provide CDBG assistance to non-profits and public agencies to fund a new program or a quantifiable increase to an existing program that provides community-based services designed to enhance the quality of life. All eligible programs must satisfy the regulatory requirements of the CDBG program and be designed to primarily serve households earning less than 80% of the area median income.

In 2013, Milwaukee County will provide \$147,779 of CDBG to the following activities under this strategy.

Senior Services

| | | |
|------------------|-------------------------|------------|
| City of Cudahy | Program for the Elderly | \$6,000.00 |
| City of Cudahy | Project Concern | \$6,200.00 |
| City of Franklin | Senior Travel | \$5,883.00 |

| | | |
|-----------------------|--------------------------------------|-------------|
| City of Franklin | SW Interfaith | \$3,381.00 |
| Village of Greendale | Adult Program Services | \$9,702 |
| City of Greenfield | Senior Services | \$17,209.00 |
| City of St. Francis | Elderly - Interfaith | \$5,000.00 |
| Village of Bayside | Public Service - Senior Services | \$5,598.00 |
| Village of Brown Deer | senior citizens center – senior club | \$25,017.00 |
| Village of Shorewood | Senior Resource Center | \$10,000.00 |
| Village of Shorewood | Shoreline Interfaith | \$2,500.00 |

Food Pantry Support

| | |
|---|------------|
| City of South Milwaukee, Human Concerns | \$3,000.00 |
|---|------------|

Employment Services

| | |
|-----------------------------------|-------------|
| Wisconsin Community Services, Inc | \$23,289.00 |
|-----------------------------------|-------------|

Driver's License Recovery

| | |
|-----------------------------------|-------------|
| Wisconsin Community Services, Inc | \$25,000.00 |
|-----------------------------------|-------------|

Strategy: Economic Development

CDBG funds will be used to support economic development initiatives throughout suburban Milwaukee County. These efforts will foster business development and economic opportunities for low-income residents. Potential economic development activities include but are not limited to direct assistance to businesses, microenterprise assistance, and commercial façade improvements.

Micro-Enterprise Development

Wisconsin Women's Business Initiative Corp \$60,000

Barriers to Affordable Housing 91.220 (j)

Barriers to Affordable Housing 91.220(j)

Describe the actions that will take place during the next year to remove barriers to affordable housing.

Barriers to affordable housing in Milwaukee County can be categorized, primarily, as either public policy issues or economic issues. Public policies establish practices implemented by municipal agencies or departments that can impede housing choice, increase housing costs, severely limit housing opportunities, or a combination thereof. The impact of public policy on affordable housing in Milwaukee County can be intentional or inadvertent. Recognition of the impact of public policy on affordable housing is required to ameliorate its negative results.

Economic issues impacting affordable housing can include high unemployment and poverty rates, low education attainment rates, limited job opportunities paying livable wages, a deteriorating housing stock offering poor housing choices, and limited neighborhood revitalization, among other trends. While economic issues may be easily identifiable, resolution is much more complex and long-term.

Milwaukee County completed an update to its Analysis of Impediments to Fair Housing Choice in 2008. This was submitted to HUD and approved. A summary of barriers to affordable housing in Milwaukee County of Milwaukee was identified through Milwaukee County's updated Analysis of Impediments to Fair Housing Choice. Listed below are the current impediments to fair housing:

| No. | IMPEDIMENTS TO HOUSING |
|-----|--|
| 1 | Inadequate Fair Housing Ordinances |
| 2 | Absence of a Commitment to Enforce the Requirement to Affirmatively Further Fair Housing by Milwaukee County's Community Development Block Grant Program |
| 3 | Lack of Housing Units Accessible to Persons with Disabilities |
| 4 | Inadequate Affordable Housing Supply |
| 5 | Inadequacies within the Milwaukee County Rent Assistance Programs |
| 6 | Milwaukee County Lacks Monitoring of Mortgage Lenders and the Community Reinvestment Act (CRA) |
| 7 | Zoning as an Impediment: Group Homes, Community Based Residential Facilities, and Community Living Arrangements |
| 8 | Illegal Actions of Milwaukee County Municipalities: Fair Housing Litigation |
| 9 | Inadequacies of the Milwaukee County Transit System |
| 10 | Lack of Section 8 Housing Choice Voucher Availability |
| 11 | No Regional Strategic Plan for Housing |
| 12 | Constant Attack on the Community Reinvestment Act (CRA) by Banking Regulators |
| 13 | Wisconsin's Smart Growth/Comprehensive Planning Law: No Enforcement Mechanism |
| 14 | Lack of Resources/Incentives for Developers to Build for the Lowest Income Households |
| 15 | Wisconsin Housing and Economic Development Authority (WHEDA): LIHTC Allocation Scoring and Qualified Census Tract Limit Housing Opportunities |
| 16 | Suburban Policies |
| 17 | Housing Incentives – Lack of incentives for developers |
| 18 | Mortgage Lending – Discrimination in the Lending Market |
| 19 | Homeowners Insurance – Discrimination in the Homeowners Insurance Market |
| 20 | Discrimination in the Housing Sales and Rental Markets - |

To provide Milwaukee County a starting point to develop and implement a comprehensive fair housing action plan, the Analysis also provided recommendations to address and remedy the identified barriers to fair housing. The recommendations are broken into four categories; 1) Milwaukee County Policy recommendations, 2) Milwaukee County Municipal recommendations, 3) State and Federal Policy related recommendations, and 4) Private Market-related recommendations.

Milwaukee County is committed to removing barriers to affordable housing in Milwaukee County. During the 2013 Fiscal Year, Milwaukee is plans on supporting the following activities to address affordable housing barriers by 1) supporting Comprehensive Fair Housing Services and 2) supporting a Countywide Housing Trust Fund.

Other Actions 91.220 (k)

Other Actions 91.220(k)

Describe the actions that will take place during the next year to address obstacles to meeting underserved needs, foster and maintain affordable housing, evaluate and reduce the number of housing units containing lead-based paint hazards, reduce the number of poverty-level families develop institutional structure, enhance coordination between public and private agencies (see 91.215(a), (b), (i), (j), (k), and (l)).

Actions to Address Obstacles to Meeting Underserved Needs

Milwaukee County, under its FY 2013 CDBG Program Year, will take the following actions to address obstacles to meeting the underserved needs:

- Continue to provide funds for housing for owner occupied and renter occupied units.
- Continue to provide funds for new housing construction of owner occupied and renter occupied housing units that are decent, sound, affordable and assessable.
- Continue to work on the foreclosed and abandoned housing issues to help strength neighborhoods vitality.
- Continue to work on the removal of architectural barrier in the County's older housing stock through rehabilitation.
- Continue to fund rehabilitation program to help bring the older existing housing stock up to code standards.
- Continue to fund activities that assist business, employment training, and career counseling.
- Milwaukee County will continue to leverage its financial resources and apply for additional public and private funds.

Actions To Reduce Lead-Based Paint Hazards

Milwaukee County is working to reduce potential lead-based paint hazards. The Consolidated plan outlines a 5-year strategy to reduce lead-based paint hazards, which includes the following steps:

- Determine the legal and regulatory requirements to which Milwaukee County must comply.
- Determining the extent of the hazard and the population at risk.
- Assessing on-going activities to abate lead hazards.
- Identifying funding sources for lead hazard reduction.
- Investigating the most cost-effective abatement methods.

Given the urgency to address the lead-abatement issue and the dire consequences for not doing so in an aggressive and timely manner to low/moderate income population in its jurisdiction, Milwaukee County is committed to the following actions and activities to address the need to reduce lead-based paint hazards in its rehabilitation and homeownership programs. In addition, Milwaukee County will continue to work with the Lead-based paint consortium of Milwaukee County to develop strategies that reduce lead based paint hazards in the jurisdiction.

Rehabilitation Programs:

Milwaukee County will continue to ensure that:

- Applicants for rehabilitation funding receive the required lead-based paint information and understand their responsibilities.
- Staff properly determines whether proposed activities are exempt from some or all lead-based paint requirements.
- The level of Federal rehabilitation assistance is properly calculated and the applicable lead-based paint requirements determined.
- Properly qualified personnel perform risk assessment, paint testing, lead hazard reduction, and clearance services when required.
- Required lead hazard reduction work and protective measures are incorporated into project rehabilitation specifications.
- Risk assessment, paint testing, lead hazard reduction, and clearance work are performed in accordance with the applicable standards established in 24 CFR Part 35, Subpart J and Wisconsin Administrative Code DHS 163.
- Required notices regarding lead-based paint evaluation, presumption, and hazard reduction are provided to occupants and documented.
- Program documents establish the rental property owner's responsibility to perform and document ongoing lead-based paint maintenance activities, when applicable.
- Program staff monitors owner compliance with ongoing lead-based paint maintenance activities.

Tenant Based Rental Assistance Programs:

Milwaukee County will continue to ensure that:

- Applicants for assistance receive adequate information about lead-based paint requirements.
- A proper visual assessment is performed to identify deteriorated paint in the dwelling unit, any common areas servicing the unit, and exterior surfaces of the building.
- Prior to occupancy, properly qualified personnel perform paint stabilization and the dwelling passes a clearance exam in accordance with the standards established in 24 CFR Part 35, Subpart M.
- The renter receives the required lead-based paint pamphlet and notices.

Actions to Reduce Number of Poverty Level Families

The Milwaukee County Consolidated Plan identifies two strategies for reducing the number of families with incomes below the poverty level. Following is a summary of each strategy and the actions to address the strategy.

Strategy1 : Job Creation for Low Income Persons

- Action 1: Fund activities that support micro-enterprise development. Small business development accounts for 80% of new job growth in the United States. Supporting the development of locally owned small businesses provides opportunities for Low Income Persons to increase their income and wealth, either through ownership or as an employee.

Proposed Activities

- Wisconsin Women's Business Initiative Corporation, Micro-enterprise development program.
 - Milwaukee County Community Business Development Partnership, expanding the capacity of MBE/WBE businesses to grow.
- Action 2: Fund Activities that develop the workforce and connect people to jobs. The jobs market is constantly changing and job seekers need new skills to compete in the marketplace. Milwaukee County funds activities that expand the capacity of Low Income people to find employment throughout Milwaukee County.

- Wisconsin Regional Training Partnership, Employment Training & employment services
- Wisconsin Community Services, Inc., Center for Driver's License Recovery and Employability
- Action 3: Enforce regulations requiring the participation of Low Income Persons on CDBG funded activities. Milwaukee County proposes to fund a number of activities that involve construction and other services. Aggressive enforcement of Section 3 regulations will increase the number of low-income people working on these activities.

Strategy 2: Delivery of Social Welfare Programs

- Action: Milwaukee County will continue to provide a broad array of social services not only through its funding of CDBG activities but also through its provision of support services for low income people, the elderly and People with Disabilities.
 - United Community Center, UCC Olga Village Health Center
 - National Alliance on Mental Illness, Peer Counseling
 - Hunger Task Force, Farm and Fish Hatchery
 - Legal Aid Society, Foreclosure Mediation Project
 - Senior support services for local municipalities located within jurisdiction

Actions to Enhance coordination between public and private agencies

Milwaukee County will continue to work closely with non-profit housing development organizations to address the issue of affordable housing. Special outreach activities in the next year will target the business community, faith-based organizations and minority and immigrant populations. Actions that may be taken include, but are not limited to:

- Continuing to be involved in regional development issues through the Milwaukee 7 and other regional planning efforts. Regional development and planning gives Milwaukee County an opportunity to push for issues of equity, inclusion and access for low income people to opportunities throughout the region.
- Participating in the Housing Trust Fund Advisory Committee and with local housing providers to explore additional affordable housing strategies that could benefit Milwaukee County.
- Continuing to meet with public service agencies to determine how partnerships can be established to coordinate and link services.
- Meeting with private sector housing professionals to explore forming partnerships for providing additional affordable housing.
- Meeting with private and public sector economic development professionals to explore forming partnerships.
- Continuing to work with private firms and the Milwaukee County Community Business Development Partnership on increasing the number and percentage of Milwaukee County residents working on infrastructure activities.

Describe the actions to coordinate its housing strategy with local and regional transportation planning strategies to ensure to the extent practicable that residents of affordable housing have access to public transportation.

Milwaukee County will continue to support efforts and programs by the Southeastern Wisconsin Regional Planning Commission, Milwaukee County Transit System, and the Housing Authorities of local municipalities to expand access to public transportation for the unemployed, elderly, and disabled residents of Milwaukee County by:

- Working with the Milwaukee County Director of Economic Development to ensure that Milwaukee County's Comprehensive Economic Development Strategy considers expanded transit options for the unemployed, elderly and disabled residents of Milwaukee County.
- Working with the SEWRPC to ensure that regional transportation planning efforts incorporate the need of Milwaukee County's unemployed, elderly, and disabled residents.
- Working with the WHEDA to ensure that new affordable housing units incorporate Transit Oriented Design elements to ensure residents easy access to public transit options.
- Working to encourage the Milwaukee County Transit System to expand communication with local suburbs to identify the transit needs of unemployed, elderly and disabled in those communities. There is a growing need for greater public transit options in the suburbs.

Program Specific Requirements

CDBG 91.220(I)(1)

1. Identify program income expected to be received during the program year, including:
 - amount expected to be generated by and deposited to revolving loan funds;
 - total amount expected to be received from each new float-funded activity included in this plan; and
 - amount expected to be received during the current program year from a float-funded activity described in a prior statement or plan.

Milwaukee County expects to receive \$89,316 in income during the 2013 Fiscal Year from repayments of housing rehabilitation loans. Funds will be recycled back in to the Housing Rehabilitation program.

2. Program income received in the preceding program year that has not been included in a statement or plan. Milwaukee County received \$113,455 in income during the preceding Fiscal Year.
3. Proceeds from Section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in its strategic plan. Milwaukee County does not have Section 108.
4. Surplus funds from any urban renewal settlement for community development and housing activities. Milwaukee County does not have surplus funds from any urban renewal settlement for community development and housing activities.
5. Any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan. Milwaukee County does not have any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan.
6. Income from float-funded activities. Milwaukee County does not have income from float-funded activities.
7. Urgent need activities, only if the jurisdiction certifies. Milwaukee County does not have urgent need activities.
8. Estimated amount of CDBG funds that will be used for activities that benefit persons of low- and moderate income. All CDBG funds will be used for activities that benefit persons of low- and moderate income.

HOME 91.220(L)(1)**1. Describe other forms of investment. (See Section 92.205)**

If grantee (PJ) plans to use HOME funds for homebuyers, did they state the guidelines of resale or recapture, as required in 92.254.

No plans to provide homebuyer assistance.

2. If grantee (PJ) plans to use HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds, state its refinancing guidelines required under 24 CFR 92.206(b).

No plans to refinance existing debt with HOME funds in 2010-2014.

3. Resale Provisions -- For homeownership activities, describe its resale or recapture guidelines that ensure the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4).**4. HOME Tenant-Based Rental Assistance -- Describe the local market conditions that led to the use of a HOME funds for tenant based rental assistance program.**

If the tenant based rental assistance program is targeted to or provides a preference for a special needs group, that group must be identified in the Consolidated Plan as having an unmet need and show the preference is needed to narrow the gap in benefits and services received by this population.

The majority of the County's Section 8 Vouchers are being used in the City of Milwaukee and in some of the most economically challenged areas. With the implementation of the new Administrative Plan, more units in are failing inspection and tenants need to move to stay on the program. The Section 8 program will also be taking people off the waiting list for the first time in over a decade. Households having to moved have expressed the hardship of coming up with a security deposit. Not having the funds for the security deposit could put families at risk of losing assistance or missing out on rent assistance. Providing the security deposit for these households will allow families to locate in suburban communities with more school and job opportunities.

5. If a participating jurisdiction intends to use forms of investment other than those described in 24 CFR 92.205(b), describe these forms of investment.

Other forms of assistance are considered on a case-by-case basis after an application from a developer has been received and our staff has completed a pro forma analysis of the project to ensure that the additional subsidy is warranted and falls within existing federal guidelines on unduly enriching developers

6. Describe the policy and procedures it will follow to affirmatively market housing containing five or more HOME-assisted units.

The Milwaukee County has adopted a policy that requires developers of HOME assisted housing with five or more HOME assisted units to promote the availability of the housing through media suitable to reach all market segments especially those who might otherwise not be aware of the housing opportunity.

7. Describe actions taken to establish and oversee a minority outreach program within its jurisdiction to ensure inclusion, to the maximum extent possible, of minority and women, and entities owned by minorities and women, including without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts, entered into by the participating jurisdiction with such persons or entities, public and private, in order to facilitate the activities of the participating jurisdiction to provide affordable housing under the HOME program or any other Federal housing law applicable to such jurisdiction.

Milwaukee County operates an active MBE/WBE program with a goal of up to 25% MBE/WBE participation in all goods and services contracts. Additionally, Milwaukee County takes affirmative

steps to maximize participation by Section 3 qualified contractors in all HUD funded housing development activities.

8. **If a jurisdiction intends to use HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, state its financing guidelines required under 24 CFR 92.206(b).**

No plans to refinance existing debt with HOME funds in 2010-2014.

HOPWA 91.220(l)(3)

1. One year goals for the number of households to be provided housing through the use of HOPWA activities for: short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family, tenant-based rental assistance, units provided in housing facilities that are being developed, leased, or operated.

Not applicable, as Milwaukee County does not receive HOPWA funding.